# Building Success: What You Need to Know about Processing Applications August 27, 2020

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0:08

Good morning everyone. I am Teri Dandeneau and I'm an Education Consultant with the State Department of Education, and I want to welcome you to our very first webinar on application certification and what you need to know about processing applications.

0:25

We have a lot to cover today, there's no doubt about it, and I want to start off by welcoming you and also introducing you to my colleagues, who are going to be presenting with this workshop, and I'd like to introduce you to Fionnuala Brown, and Susan Alston and also Shannon Yearwood.

0:48

And, I just want to let you know because I'm sure that you're all wondering about the PowerPoint presentations and the handouts are part of the handouts section that you see on your screen, hopefully, and so that way, you'll be able to download them, or save them, and then look at them later on, and you can follow along, if you're lucky enough to have two screens with the PowerPoint presentation. If you have a bad connection and you're hooked up to your department VPN, you want to make sure that you, if you have any problems you might want to go off of your VPN, but go to it still it should function.

1:24

And, if you have any questions during the presentation, there's a question area on your screen, where you can ask the questions. You just type them out, and then you ask the questions, and we will break every once in a while to answer as many questions as you have, okay, and also, this workshop will be recorded. We hope to, and it has to be transcribed, but we hope to have it up on our website, so, if your colleagues wanted to come and they weren't able to, because there's other meetings going on or whatever, eventually we will have this posted on our website. So, I just did the introductions, and I now want to turn it over to Shannon Yearwood.

2:10

Thank you so much, Teri and welcome everybody to where it will be a fact filled, action packed training for you, and, as you know, the income eligibility applications are the heart of our programs.

2:24

This is how we are able to tell, to reach the most kids with the nutrition programs that you're serving, and make sure that they are able to access them, no matter what their income is. We know that there's a lot of complexities with it, that there's a lot of requirements with it, and it can be a little bit of an art, along with the science. I know, last year was my first time attending this workshop with the Department of Education, and I learned a ton, and I hope that you will too today. We will have a little bit of a break, and we'll have some fun things thrown in for you as well, so make sure you pay attention as we're going along. This information is very important, and it's critical that you get these income eligibility applications correct, so I will keep this introduction short, so that we can dive right into the presentation and I will hand it back over to Teri, but thank you so much for joining us today.

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#### 3:17

Okay, we're going to be going off video so that way you just see the screen, so we're going to be clicking off the video right now.

### 3:37

Hopefully, anyway, okay, hopefully it's bigger for you so you can see it. So one of the things that is, I call it the Bible of processing applications, it's the eligibility manual for school meals.

## 4:01

USDA hasn't updated this for a few years, so if you have the version dated July 18th of 2017, that's the one that you want to refer to. It is found on our website, Susan Fiore has done a wonderful job, with putting a whole section on the web site just on the eligibility process.

#### 4:23

So, if you go to program guidance, and you click on E, you will come down to eligibility, and you'll see not only the manual, but you'll see a website dedicated to eligibility okay, I do want to point out that this website, I mean, this presentation, does not cover all areas in the manual. It's quite extensive, and that we cover highlighted important areas of the manual.

#### 4:49

Now, one of the handouts that you have is the calendar, and this is a calendar that gets updated every year, and it provides you with important deadline dates and information, and that you need to follow in order to make sure that you do the things that are required. It's not just about processing applications or conducting verification, it's about all of the things that are going to be required. It has been updated, it's on our website, and you have the handout, and you'll notice that the link is there as well as on the presentation.

#### 5:29

Now we have some important terms, and I want to go over those with you. The first one is the Determining Official, and this is the person that is responsible for processing and reviewing the free and reduced meal applications. This person is very, very important, and I'm sure that many of you that are determining officials, do multiple tasks. You have other responsibilities, but this is an important one.

#### 5:59

And because if it wasn't for you, these children that are eligible for free and reduced price meals via an application would not be determined to be eligible. So you have an important job, and I know that August, September, and October are very busy times for determining officials, because you get a lot of applications that come in to process.

#### 6:28

So, the Verifying Official is another important person, and that is the person that is responsible for conducting the verification process. Yesterday and the School Lunch Tray, which is a weekly announcement that we send out to anybody that's signed up to our e-mail distribution list. It has a lot of important information, such as operational memoranda, anything that has to do with the

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work that we do in child nutrition. It announced that next September 3<sup>rd</sup> will be the verification training.

#### 7:01

Many of you work with the verifying officials, so you work together because they both really go hand in hand.

#### 7:12

Then we have the Direct Certification contact, and that's the person who was designated to have access to the Direct Certification Web Application, and we're going to go extensively into what Direct Certification is in a few, I have a few slides that are coming up.

#### 7:30

And then we have the Hearing Officer, and a hearing officer is the person who is responsible for conducting a fair hearing if a parent or guardian requests it and they may request it because they don't agree with the determining officials determination of their application, or the verifying officials determination of the verification process, and every person has the right to a fair hearing.

### 7:57

And so if you ever read the language in the nondiscrimination statement, that's part of many of the forms that you use, you'll see that parents and guardians have a right to a fair hearing if they so choose.

### 8:21

Now, can the determining official and the verifying official be the same person, we often get that question, and the answer is yes. Many times, both are the same person, because their work, they work closely together, okay? But if you do have somebody that does verification process on their own you need to be aware of what they're doing and they need to be aware of what you're doing.

#### 8.44

Can the determining official and the verifying official also be the hearing official, and the answer is no, okay. The hearing official is somebody who cannot be part of that process at all, they have to be completely separate from it. So, for example, a lot of times its principals or administrators who are the hearing officials for the school district for the school.

#### 9:17

Now, if the secretary reviews and approves the applications, and the principal actually signs off on the application, who really is the determining official in that situation., and when we conduct administrative reviews, we often see this n the, on their online agreement. It will say that the principal is the determining official, but the Secretary is the one who is really doing all of the work, and the principal just signs off on it. Sometimes not even looking to make sure that the secretary or administrative assistant is completing the information correctly. So it really is important that the online payment reflect who is actually processing those applications, okay. If it's the principal, the principal needs to make sure that all of that information is looked at and that

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they agree with it, okay? If the principal is just signing off, because they think that they have to sign off on it, then that's not necessarily, they're not necessarily the determining official.

#### 10:22

Now we're gonna get into some terms, and these can sometimes be confusing, and the first term is Operation Days, and operating days are those days on which meals or milk is provided. That's what you can consider that USDA considers to be an operating day. And all of this information, by the way, is found in the eligibility manual guidance. So if you need to go into more detail or research it more, you can always refer back to that, and I encourage you to do so.

#### 10.50

Then we have calendar days, and calendar days are the number of days represented on the calendar, right, that's simple.

## 10:59

And then we have working days and working days are the days when school is open and teachers or school administration are on-site, but the reimbursable meal service is not in operation.

#### 11:12

And with all of the things that are going on with COVID and all the changes that are being made in the schools and where the remote learners and on-site learners are in school learners, these terms can sometimes get cloudy. But just remember to go back to this, because this tells you what operating days, calendar, days and working days are.

### 11:35

Now, there really is a life to a free and reduced meal application from beginning to end, and so I want to go over some different aspects of that. And there's many, many forms that are involved with processing applications. And I think you would all agree. I mean, there's so many forms as a matter of fact, that there's a, there's a website just dedicated to all the forms that we have.

#### 11:57

So we have everything from the free and reduced price meal and milk application form, frequently asked question, parent letter, media, public release form, and then all of the different types of notification letters, depending upon how an application was processed.

#### 12:18

Now, the Determining Official, that's what DO stands for, should develop a system to separate and flag out the eligibility based on the different types of ways to determine an application.

# 12:32

So, if a student is directly certified for SNAP, and we're going to talk about Direct Certification in a bit, not the letter method, okay. They need to be able to separate that out, and you want to do that from the beginning, okay?

## 12:45

So, those children that are directly certified as free through other programs, students that are directly certified for SNAP, but because they're via a ladder method, students that are directly

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certified for Medicaid, reduced, and applications, and students determine does free based on income, and that's your paper application.

#### 13:07

Or if you're doing web based applications, then applications and students that are determined does reduce based on income, or income.

#### 13:15

And then your error prone applications and error prone applications, or those applications that are approved, or a household income is within \$100 a month, or \$1200 a year, of the income eligibility guidelines.

#### 13:35

Now, as a reminder, okay, you will need to know what error prone applications are.

#### 13:42

When you start to process your applications, okay, so in this example, we have the Income Eligibility Guidelines, and if the annual income is twenty one thousand dollars per family, up to this, would be within the \$2200 a year for the error prone requirement, and thus would be error prompt.

#### 14:03

Now how do you figure out error prone if the household checked off two times a month or weekly? And this little chart tells you how to do that.

#### 14:10

Okay, so you'll want to keep, remember slide 13, in case you need to do that, now some of you have computer programs or software programs that automatically do this for you, especially if they're a national program, and most of them are, but some of you are very small, and don't collect a lot of free and reduced applications. And so you would need to know this, so that way, you would be able to determine, determine error prone.

#### 14:38

Now, it's really important that when you look at the application you review, and make sure that you fill in the areas that apply to your specific school well, and what we've done is we've highlighted those areas for you. So for example, if you, where it says on the first page of the free and reduced meal application, it says apply online, and then it says, it says insert a website. Well, if you don't have a method for them to apply online, you don't have web based applications, then you wouldn't include that on the application, okay because it's, it doesn't apply to your program. So you really do want to look at the application, and a lot of questions that you have are actually answered within the application itself.

#### 15:26

And here's some other areas that are highlighted as well, and this gives instructions to the parent or guardian to show how to complete the application, and it would be confusing to the parent or guardian if you didn't fill in the highlighted areas.

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#### 15:44

You want LEAs, that's Local Education Agencies, must ensure that all forms, including those forms that are automatically generated by their computer software program, are compliant with federal regulations, and we often see that this is a problem, okay. When we collect that information at the beginning of the school year, or when we conduct administrative reviews, and for those of you that don't know what an administrative review is, every year we go out to review Child Nutrition Programs.

#### 16:17

And I'm not sure how that's going to look this year, but typically one of the key areas that we look at is the processing of free and reduced applications, and we could look at all applications, or we do a statistical sample, depending upon how many applications you have on file, but the application processing area is significant, and we often look at that, and so we also will go onto your website to see if that is in compliance as well, and we look at the letters that are being generated.

## 16:51

So, we have letters that we encourage you to use, so that way it ensures that the forms are up to date, and that they have the required information that USDA requires.

#### 17:08

So, you can get all the forms on our website, and the easiest thing is when you go and you'll just see forms as an option, and you click on it, and you'll see application forms for free and reduced price meals, and hopefully, most of you have seen them by now, and I gave you the links to the websites and where they are located.

## 17:30

And it's important to mention as well, that USDA has multiple translated free and reduced materials for you to use and we give you that link, so that way you can use them, and they're free and reduced meal application looks a little bit different than ours, because for a variety of reasons, but what I find is that sometimes we get a question, well, if we get an application in Chinese, how are we supposed to understand what its saying? Well, then you pull off USDA's English application and then you follow along that way.

#### 18.01

And that's the best way to understand how that Chinese or foreign language application, for example, is completed.

#### 18:13

Now here's a question that you want to ask yourselves is how do parents or guardians know where to find the forms that you have, the free and reduced materials, okay. Well, they can get the media public release form.

#### 18.31

Everyone that processes patients, everyone that in the School Child Nutrition Programs, has to send out a public release to all, to the public, okay.

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#### 18:46

Also, on the district's website, make sure that your website is up to date and easily accessible, they can find the forms in the school office, back to school packets, right, our website, the local library, you can advertise it on the menus, okay.

#### 19.10

So that's where the, that's all the different areas, and there's probably more of where they can find the forms to use to complete the applications.

#### 19:20

A very important handout is the points to remember when notifying parents of a child's free and reduced eligibility. I'm not sure if that handout was able to be posted, and if it wasn't, this is the link where you can find it.

#### 19:32

You do want to refer to this handout because it answers a lot of questions around, you know, can I e-mail or can I mail, or do I have to send it home in their backpack? All of those kind of questions about notification or sending out the original free and reduced meal application information, and the different ways that you can do that. So, please refer to that handout. It's very, very important.

#### 20:00

Okay so a lot of times, we have questions about the notification at the beginning of the year, and this just gives you an example of what's in that handout. And LEAs must distribute information letters either by postal service or e-mail to the parent or guardian, or include in the information packets provided to the children. So you're required to do that, but you don't have to do it through mail. Now, you can do it through e-mail, which is great, because it saves on postal costs and things like that, and then covers notifications throughout the year, and then notification of Direct Certification, and this is just a SNAP shot and wants to work up on that flyer.

## 20:42

So, the media public release, that's one way parents know about how to apply for free and reduced priced meals. Okay, so near the beginning of the school year, each school or district must send out a formal public announcement that the school or district is participating in. The Child Nutrition Programs, this is based on regulation, you have to do this. You have to list the current free and reduced income guidelines on that. You're required to send it out to news media outlets, to the local unemployment office, major employers, contemplating layoffs, etcetera.

#### 21:22

The sample press public release form is on our website at the State Department of Education, and it's under Forms.

### 21:32

And you need to make copies available upon request, but you don't have to pay to have it posted in the newspaper or any media outlet.

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#### 21:43

Your obligation is to send it to them, but you don't, they don't have to choose to post it because they could cost you hundreds of dollars. So your obligation is, is that you sent it out, but you do need to track it, and on the public release, it shows you where, there's a list of, where you can, you know, put all of the sources that you sent it out to.

#### 22:04

Informing households. So at the beginning of each school year, information letters, such as the Frequently Asked Questions about free and reduced price, meals, must be distributed to the households of children attending schools.

# 22:16

If you look at that notification handout that I just talked about, it tells you the different ways you can distribute it, and the letter tells families which Child Nutrition Programs your district is participating in, and it notifies them of the meals that you're providing, okay.

### 22:32

And also, if milk is provided, if you're participating in pre-kindergarten split day pre-kindergarten milk program.

# 22:46

Also, Direct Certification Matches, and notification of benefits completed in early August would eliminate the requirement to send the back to school application materials to those directly certified households, because they don't have to apply. So, we did the direct certification rollover, I think it was last week.

#### 23:04

So, anybody that was directly certified, they would not need to send this information to you, because you have already determined to be eligible for free or reduced priced meals, okay? So, you're not obligated to do that.

## 23:19

The LEA must include Addendum A, we're going to talk about Addendum A. Addendum B are not required. However, it is strongly recommended.

#### 23.28

And we're going to talk about the different Addendum C, A, and B, in a few minutes.

### 23:34

Now, a word about Direct Certification.

## 23:37

You want to access the Direct Certification List as early as possible because it's going to decrease the number of applications you're going to have to process, because the parents won't have to submit an application to you if they're directly certified.

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#### 23:55

So what is Addendum A, Addendum A is optional, you don't have to do it, but it's there for you to use if you, if your district plans to share information up. There are free and reduced price information for other purposes.

#### 24:15

So, for example, let's say your school district has free field trips or provides free sports year for children and if they're eligible for free and reduced price meals, then this allows the parent to sign off on it and say, yes, I want I'm allowing you to share my free and reduced information for the purposes of getting Thanksgiving baskets, you know, in November.

## 24:48

And when you fill this out, if you so choose, you want to put the title of the person. It doesn't have to be the name, but it could be principal, it could be social worker, athletic director, school nurse, okay, and you would put that in there.

#### 25:02

And then, the applicable program, you can't leave this general, okay. I've seen people leave this blank, which means it doesn't mean anything.

## 25:12

And, and I've seen people not list the title of the person who would have access, and that's really critical because the parent or guardian may want to know who's going to have access to their information.

### 25:26

For example, if this is just an example if their nurse is their neighbor and they don't want their neighbor to know that their child is getting free or reduced price meals, then they may not want the school nurse to get access to the information for free physicals, okay. So that's why it's important to be specific here and the parent has the right to say, no.

## 25:48

I don't want to share my information for anything, and that's it.

#### 25:55

You want to make sure that you ask them to check this off, they send it back to you that it's signed by them, okay, by the parent or the guardian, and that you have a way of processing this information, okay.

# 26:12

So many more schools use it now than they ever did before, which is, is a good thing.

#### 26:30

Now, one of the things that we see is, there's a backpack program that occurs on a lot of towns in Connecticut, and it's actually national program through Feeding America, and it provides for children to take home during the weekends. It's a great program, but LEAs cannot share the list

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of free and reduced price students, unless the district has written permission from the household through this program.

26:52

And you have to have measures to ensure that there's no overt identification that the children are not identified as free, or reduced being eligible for free or reduced price meals.

27:03

So, this is just an example of a program that you might list on addendum A.

27:12

Then we have Addendum B, and Addendum B is, has to do with Health Insurance and HUSKY.

27:21

Again, it's optional, but we strongly encourage you to use Addendum B, because not only can your children be eligible, but they can also get information about adults being eligible, and maybe your employees could benefit from this, as well.

27:35

So make sure that you consider using Addendum B, we work with the Department of Public Health to get this out every year, and to get it updated every year.

27:46

Then we have addendum C, and addendum C is mandatory, and that was put into state statute.

27:54

All, I'm going to say, back in 2015, okay, and what Addendum C is, is it basically informs the parent about how they can receive SNAP benefits, okay, and SNAP used to be called food stamps, and it gives them resources and information on where they can go if they want to get more information about SNAP.

28:18

So you need to make sure, and posting this on the website, on your district website, is not good enough, this has to get sent home to the parents.

28:26

You can e-mail it to them, you can mail it to them, you can put a part of their pocket, but they need to get this, alright. Now we get many, many calls about, well, Teri, the effective date is October first of 2019, but we have new income guidelines. While DSS's income guidelines don't get updated until October until September or October, first, they get updated by October first. So, what I will do is, I will revise this form in September, and then put it up on our website, but it's not ready for you now, because they're using these guidelines, because they are in effect until October first.

29:06

So, this is why this Addendum has not been updated yet, okay, but it will be updated, and this is the one that you can use right now to send out to your parents.

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#### 29:18

Informing households, so all LEAs must be able to provide households with paper application, and materials, because we assume that everybody has the internet that everybody has access to the internet, and that's not always true.

#### 29:31

And we have found that out during the past few months with you know kids learning from home, and so, you need to be able to have paper applications, and you need to be able to advertise that, so carrots need to know where they can get them okay.

#### 29.44

Information, letters cannot be such home at the end of a school year for the next school year and accepted and processed by the LEA before the beginning of the federally defined school year.

## 29:55

So, you want to make sure that the school year is from July 1<sup>st</sup> to June 30th, and you're around schools, and I don't think we have many yet as July 1<sup>st</sup> to June 30th.

### 30:09

And that follow, that, they would distribute the information letters in June, okay so it gives you a little bit of clarification about both of those.

#### 30:19

Now, the information letter can be distributed by postal service, e-mail to the parent or guardian, or included in the information packets to the students.

### 30:31

If the LEA only uses paper applications, an application form, and instructions must be included with the letter to the households, very important so that they know how to do it.

#### 30:44

So I mentioned earlier, web based applications, and that there's an area on the free and reduced meal application form to indicate how they can access this, and not everybody uses this, but we're finding out, more and more districts are using web based applications.

# 30:58

And basically, it's allowing the parents to go online and instead of completing a paper application, they actually do it online.

#### 31.06

And we have a new document that was actually done, it's not so new. It was done, I think last year, and it's considerations when implementing online web based application, and that I believe was one of the handouts, otherwise, you can find it on the website. Yup, we provide that to you on the website.

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#### 31:34

So what we see is we actually will go online to look at your web based application and see if it complies with the paper application and with the federal regulations. So, what we find is that many of the fields will say, required.

## 31:52

And, so, for example, in this one, which is an actual snap shot from a web based application, that a district is using, it requires that they submit the first name, the last name requires that they submit the birth date and the school, and while that information is helpful for the determining official school district, it is not required by USDA.

### 32:15

You can ask for it, but you can't stop the application from moving forward. If a parent decides they don't want to give the birth date or the school, or perhaps they don't know what it is for, whatever reason. Okay, so you want to make sure that you don't have barriers that are now followed under regulation, that create a parent from not processing or proceeding with completing that application.

## 32:44

Here's another example where they're requiring that the address be provided, and, again, those are areas that are not required by USDA in order for that application to be processed. You can ask them for it, but you can't mandate they give it to you in order for that application to be processed.

## 33:06

Another thing that we find is that there will be a language on your web based application that doesn't apply to the State of Connecticut, alright, so, and it's because the software program is probably coming from another state, or the company used, they gave you another state's template, alright, so it's your responsibility to make sure that's your web based application is up to date and complies.

### 33:34

And in this example, it asks if your household receive SNAP, FITAP, or FTPIR on behalf of John, he or she may automatically be eligible. So, when I asked the determining official, what does FITAP means? I go, I don't know.

#### 33:51

And they didn't know what FITAP was yet, they were allowing the parent to check off one of those, and I said, well, what happens if they check off FITAP, and you don't know what it is, and they said, I don't know. So you need to know what happens when they check these things off, and because I don't apply these this, these two areas do not apply to Connecticut. They actually were from Louisiana and its Temporary Family Assistance, the FITAP.

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#### 34:18

In other areas, you need to look at your drop-down boxes and to see if they're asking or allowing the parent or guardian to check off something. That again, doesn't apply in Connecticut, and in this case, it would be FTIPR, which is the federal, it was the Indian reservations food distribution program.

## 34:41

So another one is the migrant, I see this a lot on the web based application where they allow the parent to checkoff migrant, and Connecticut does not have a migrant education program, and you will see that on our free and reduced meal applications, This is not an option, and because we don't have the program.

#### 35:02

So you want to make sure you work with your software company to take that out, because what happens if the parent checks that off, does that mean that's going to be processed, and they're going to be automatically eligible for free meals, okay? Also, I saw this on a Connecticut web based application, they actually talked about Medicaid and CHIP.

## 35:32

And they had the parent check off whether or not they allowed to share their information for Medicaid. So I said, well, what happens again when they check this off and they didn't know.

## 35:45

And I said, well, Connecticut is fortunate to be part of a demonstration grant, for Medicaid, and we already have an agreement with USDA to work with that Medicaid information and share it, so it's not applicable at all. So that shouldn't even be anywhere here, that came from another state. You know that's not part of the demonstration grant for Medicaid.

#### 36.14

So one of the things that you wanted to ask yourself is, and you need to do this, you need to go into your website.

## 36:20

How user friendly is your district's website to get to the free and reduced materials? Can a parent or guardian easily find the free and reduced priced application?

#### 36:31

How many clicks does it take to get to that application? It's amazing, sometimes it's really easy to find when we go on a district's website, and sometimes, I can't find it at all, and then the Food Service director or the Determining Official is getting an e-mail, alright.

# 36:46

So you want to make sure that you look at this, have somebody who's not familiar with your website, access it, and see if they have trouble finding out the information.

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### 36:56

I also often find outdated information on somebody's website, so this information needs to be updated every single year, if you're going to use your website, and I encourage you to do so, to have uh these, have this information posted.

#### 37:11

So, we're going to take a moment, and we're going to pause, take a deep breath, for questions that have come in, and I don't know if there's any questions that have come in or not.

### 37:32

Shannon do we have any questions or Michelle? We do Teri, that and so one of the questions is that we talked about operating days this year, with the hybrid plan, should they use a four day week for the 30 day grace period?

## 37:53

Well, I'm not really sure what the 30 day grace period, you're talking about okay are you talking about September when they rollover, okay.

## 38:03

This is why I suggest that you do operating or days where meals are being served, so you want to look at this, this might be different for everybody, but try and make it simple, because I know it looks complicated.

#### 38:17

If you're serving meals five days a week, whether it's remote or in school, you've got five days of operating, okay, if you have a day off, like we have Labor Day coming up, and there's no academic learning on that day, school's not in session, then you would not count that as an operating day.

#### 38:35

So you would start from your first day of school, first day school is in session, and you would count your 30 operating days from there.

## 38:42

So, don't look at it, you want to look at the number of days you're serving meals and so if you're serving meals for all five days, you've got five operating days.

#### 38:52

Okay, alright, so, yep, we have one more question, and I'm gonna summarize this, it's pretty specific, but I think that it's one we can make pretty general. So if we have a program where children are self-identifying as free or reduced, and they reach out to the district, how is it that they can share the information or validate that information? Whether the child is eligible for free or reduced price meals, they just share that, or do they need to go through a process?

## 39:22

So I think what they're saying is, a child is eligible for free or reduced price meals, and they want to share that information, would it be the Determining Official?

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#### 39:31

Yep, So I think what it is, Teri is that another, a different program outside of the school that the child might be part of, may give discounts for being eligible for free or reduced price meals, and so the child will, the child or the household will self-identify, and then the institution or the program will reach out to the school district to ask the school district to verify that income eligibility. What do they need to do to make sure that that's protected, okay?

### 40:01

So if a parent is contacting you or a program is contacting you saying: for example, Johnny Jones wants to do play to pay and or is it pay to play? They want to do that.

#### 40:16

And so they need to verify that Johnny Jones's receiving free and reduced price meals, well, you can't give that person information without parental consent.

#### 40:26

So, you would either have them talk to the parent, and remember, you're notifying parents of a child's eligibility, okay, and there's a form for that parent notification letter.

### 40:39

And they should be the parents should be keeping that form so, that way, if they need it, and sometimes I see this, and I think it might be on our forms too, you know, please keep English in case you need to share it, you know, for other services. So the parent can send a copy of that form, because the parents doing it to the coordinator of whatever program, wants the information as proof, because it's going to be on your letterhead, its data, its signed, okay. So that would be the way to do that. You cannot share that information unless you have the parents' permission.

# 41:14

Thank you so much. Yeah, we actually have quite a few questions come in, so for this one is in regard to that public release, when do they have to do all of the three items checked under required there, just maybe if you could give some tips around how they would know that a company might be expecting some layoffs, just so that we can help them, okay.

#### 41:36

So you want to try to make sure that you're doing with your public release, that you're sending it out to as many avenues as possible, right? Because you want as many people to know that you are participating in the Child Nutrition Programs and what they need to do in order to access those programs. So, you may not know that there's a company that's doing layoffs, you might hear about it in the news you might be notified or whatever. And so, if you hear about it, then I would certainly encourage you to do that. We like to see your use as many as possible, the most frequently used, of course, is the newspapers, okay, or different news media outlets, as far as , this is just not your, like, your local newspaper, for example. That's how we usually see people posting it, and you want to make sure that you keep track of it, okay.

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## 42:28

Thank you. Yeah, a couple more, so, one of the folks here is both, she is a secretary and also the determining official, and the question is, should I be the one signing off on the application, or should it be an administrator?

#### 42:47

Well, it depends on who's processing the applications, not all administrative assistants or secretaries are responsible for processing applications.

### 42:57

It varies from district to district, and so whoever's the person who's been given the responsibility for processing the applications is the determining official, does that help, I hope.

#### 43:11

So, and I would encourage the person who submitted this question, if you need some more technical assistance, to reach out to your county consultant and talk through what your specific questions are, in case, but that wasn't necessarily specific, specific answer for your situation. This one's in regards to online applications, and do they need to print out each application for their files, or they can, or can they be paperless.

#### 43:40

Do they need to print out, oh, if it okay, it's up on the, no, you don't. If you're doing web based applications and it's being processed, you do not have to print them out, however, that's said.

## 43:51

If you're going to have an Administrative Review, or if a town auditor wants to look at some of those applications as part of the town audits, you have to have a mechanism for them to be able to access that information.

#### 44:05

And we may ask you to print out a snapshot of how that child was determined to be eligible, or we may ask you access to your program as an auditor, to make sure that we can see it behind the scenes because we may be doing a statistical sample. And if you're doing web based applications, there may be a handful of applications that we're looking at that are part of that, a statistical sample that are web based.

#### 44:30

So you do not have to print them out, that defeats the whole purpose of doing it. But you do need to have a mechanism of in case where there has to be a system where we check it, that we're able to do so.

# 44:41

That's great. I'm sure, I'm sure that that's coming as a relief to that to that question asker. So another question around the application, and the information that's being collected on those applications, if the district does not have the birth date or the address, and they have children with the same name, you give advice on how they should distinguish those children from each other?

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45:06

If it's the same household, or the district has children with the same name? You can always, if you have an application that's been submitted, and you need clarification, you can always contact the household. Makes sure that when you do contact the household, you're only speaking to the person who signed off on that application.

45:23

No one else, okay, because of confidentiality and get clarification from them.

45:32

Great, I have another, another really good question here, Teri, so they can, can the district go online for the application and attendance, if they're trying to go paperless? You can go on online, absolutely, but you have to have paper applications made available to the parents in case they don't have access online, think about it.

45:56

The whole point of this is to have parents have the ability to apply if they need it, as you know, I mean, there's, there's so much going on. And you also not only would need to have paper applications, but you need to let them know where they can receive them.

46.12

Great, and we did have a couple of questions around that. So I really, I think that's great information, and we may just want to re-iterate that at the end as well. And I know that that's kind of an ongoing question as we move into this age of technology and embrace it. And then can you just remind us about direct certification? Does the direct certification from last year carryover for those, for those first 30 school days?

46:36

We're going to be covering that under the Direct Certification Section that we're going to be going over and in a little bit. Wonderful, well, that's great to go over.

46:45

I can go over it now, very quickly, and direct certification, there's 30 operating days from the first day of school, so you can, yes, carryover direct certification from last year.

46:57

But the caveat is, if their name shows up this year, you would then use that direct certification determination you would not, you would end the carryover okay, and so, we'll get, we'll clarify that on another slide that you're saying, it's a great question.

47:17

And it was a, it was great foreshadowing too, so that we, this is our, that was Susan's cliffhanger for us moving into the next section. So we're gonna stop the questions for now, that's where the majority of the questions and, look, I'll continue to monitor these so that, when we pause for questions, again, we'll make sure that we get the ones that may not have been covered, but thanks so much, Shannon, absolutely.

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#### 47:44

Okay so, now I'm going to turn it over to, I believe, it's Susan? Oh, it's Fionnuala, who's doing the next part, let's see. Yep, I am Fionnuala, sorry Fionnuala.

#### 48:02

Okay, so, before we go into the next section, even based on those questions, I just wanted to mention that we are aware that there are brand-new determining officials on this webinar. So this may be your first year processing applications, directly certifying students. And then we have participants who have been doing this 10, 20 years. So, for a year, for the new determining officials, we want to make sure that you know that you can reach out. If you are brand new, we'd like you to call us, e-mail us. Teri Dandeneau, Susan, Alston and myself, identify who's your county consultant and make that connection.

#### 48:45

We understand that there's a lot of resources, a lot of regulations around processing applications, certifying students. And it is sometimes difficult to navigate through all of that. So we are here to help you. Please feel free to reach out to us if you are brand-new, and if you are not brand new, we are here to help you.

#### 49:06

So I wanted to say that, and before I get into this slide, I also just wanted to mention to organize this presentation to assist determining officials with flow. We're obviously talking about the life of the free and reduced application, but we are also covering directly certifying students. And really in order to be efficient with, and Teri mentioned this with processing applications, you would be directly certifying those students that would be eligible to receive benefits, before you would be sending out those applications and all of the applicable forms. So, we have covered that. And I just wanted to mention that again.

# 49:54

So, at this point, you have directly certified students, you notified those students that are directly certified. And then you've sent out applications to your students via paper applications the web and all of the applicable forms that Teri mentioned, the required forms, and then the optional forms. And now, at this point, we are receiving those applications back, so we are still under the life of the Free and reduced application, or rather certifying students. And then how do determining officials accept and receive the completed application? So you get those applications, either directly from the parents, from each school, or on, as we mentioned, that if you have online applications, or you can even get those via e-mail. So, there's a number of ways you will be receiving the applications for free and reduced price meals. All right, next slide.

#### 51:01

So, you've processed the application, and where do you place these applications? So, these applications and all of the information is highly confidential.

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#### 51:12

So would you not put them in a pile on your desk, leave them in a pile on your desk, or in a folder on your desk. No, no, and yes, into a locked file cabinet. So this, again, we just want to reiterate that as the determining official the free and reduced eligibility.

### 51:32

Status information is highly confidential. Their rules and regulations around who you can share that with. Teri covered on the Addendum A, and, you know, receiving parents' permission for potentially sharing that information, they need to be kept in a locked file cabinet. They are important. Documents that are not, should not be accessible to anyone, alright. Next slide.

### 52:00

So, as a determining official and all of this information, again, is in the eligibility manual. You'll have this slide. These uh presentation, but, you can go back to the eligibility manual. Applications need to be reviewed in a timely manner.

### 52:13

So, they, you have 10 operating days from receipt of the application, to process that, whenever possible, applications should be processed immediately. So, we mentioned we come out an administrative reviews. One of the things we've found is that if you are receiving applications that come in through the schools or even, you know, come in from students and backpacks. It is important to have a system in place to date stamp. So, as the determining official, you can identify when you receive the application. So, then , when we see that you have, in your process, yet, within 10 days, you'll be in compliance, 10 operating days, as opposed to, we see a parent signed it in August, and it was processed in October. There will be an issue there.

#### 53.07

If we weren't able to determine that, the determining official receive it, you know, at the end of September, So, again, you have 10 operating days to process an application, extend benefit, hence, and, you really need to, whenever possible, process those, as soon as possible, right.

### 53:34

So, you need to notify the head of household immediately if there is a decrease in benefits from the previous year. A newer lower eligibility determinations should be implemented only after the family has been notified, so to give them adequate time. Again, you, a child would be, if they were eligible for free, and then a new application to family, based on the income.

# 54:02

They are not eligible for benefits, you would like, it's important for the family to know, so they can load money on their child's account, and the child is not, you know, faced with dealing with that at the cash register. So, you want to make sure families are aware if the benefits have been lowered from the previous year.

#### 54:24

So, can you exempt and approve an application dated by the parent prior to July 1<sup>st</sup>? And the answer is, no, only applications that are dated July 1<sup>st</sup> or later in the school year can be accepted

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and approved. So, this is important to you need to make sure of that, and I would say, with the high numbers of directly certified students, we have been seeing determining officials, wait for that list to come out. And as Teri mentioned, that has been out now a week or two. So you directly certified students. And then applications usually would be coming in now, so we're seeing this less and less, like the application needs to be dated and approved after July 1<sup>st</sup>.

#### 55:17

Next slide, please, yup, it's not clicking, hold on, we'll try it again, alright, okay. So, again, with the July 1<sup>st</sup> you need to watch out for kindergarten orientation, so if applications were distributed to families in the spring, they cannot be approved and processed unless they were dated after July 1<sup>st</sup>.

#### 56:00

It's being delayed Fionnuala. It's okay it gives me a chance to breathe. Again, best practice is to date stamp all new applications when they're received by the determining official, and you must complete the bottom portion. So, we are seeing more and more when we're out on our administrative reviews that the bottom area may not be completed because you might be using a software system to then enter the eligibility status and you're not necessarily completing that on the application. So, you do need to, you are required to, under for school use only, filling out that application and identify the benefits that are being extended, sign it and date it, the determining official. If you need to contact the household for information, you document it, this is right on the application, again, the determining official, the best determining officials, if we are conducting administrative review, there would be post-it notes or notes on the application with, with dates. So, when we're reviewing those applications, we have a clear picture if they have to get clarification on anything. So, please, feel free to write on that, you know, with your initials date.

#### 57:27

And regarding the applications, the frequency of the income must be indicated in the signature of the Adult must be listed, and the last four digits of the social security number must be listed, or no Social Security box, ah checked. So there are required items, and then there, that you would must have before you would proceed with certifying an application, and this is just a reminder here of what you'd be looking at.

# 58:01

So it's important, again, to make sure all our data forms are not available for this, for the new school year or so on the website. Also, if you are distributing or Secretaries have this, be out in the schools have old forms. You want to make sure that you have it on your calendar to remind them to throw it out.

### 58:22

Sometimes we see different colored paper being used, so that is helpful for staff in the district to know what color is being used for this school year.

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#### 58:33

So really you need to make sure that the forms are for the current school year and we're obviously in 2021 now, uh um.

## 58:45

OK, so once the application has been processed and you've notified the household, what's next? Okay so developing your own.

#### 58:57

We wanted to, we wanted to get into, the next slide is fine. We want to get into, sorry, sorry, that's okay, developing the master list. So, we're kind of talking about this now, because at this point, you will have directly certified students here, you have the applications that have come in and that you've certified, identified those students that are free and reduced based on applications and then also based on being directly certified, you may have started this process several weeks ago.

## 59:35

When you were directly certifying students, you would have started to compile as Teri mentioned, those students, onto a master list, but now you can continue on and include those students that are eligible for benefits based on applications. So talking about the benefit issuance document or master list must be updated as changes are made.

#### 1:00:00

Transfers and withdrawals must be noted with the date of the transfer, withdraw the date and the school must be listed, and it's essential that you have indicated how the determination is made on the master list for benefit. So, it's either directly certified, if it's an application of foster, these are just some examples. We know that there are a number of different codes you must, be may be directly certified through extended through a household member, so that you can elaborate or evolve with your coding to help you, later on, for reporting purposes to the Department of Education, or during an Administrative Review. If you need to, look to see what documents you have, to support that eligibility status.

#### 1:00:50

So, again, the determination must be listed there, and we have seen very specific coding evolve over the years now, because of to be able to direct determining officials to the documentation that they use to support the eligibility status for students, but there are requirements for your benefit issuance docent.

# 1:01:14

So this document can be printed out directly from your point of sale system or the student information system. Or you may have a spreadsheet. Now, we mentioned this because over the past few years, we have seen some duplication. So we see these electronic systems that are being used to maintain eligibility, but then determining officials keeping a separate Excel spreadsheet. So we wanted to just point out you do need one master list is the determining official, and obviously this is updated as changes are made to eligibility status for students.

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# 1:01:54

And this is going to be a key component when you're consolidating your arm counts for the monthly claim identifying the free and reduced eligible students. So, so, this is a very important document, and it's important that it's accurate. So, we have found, and the direction that we're giving, is that you have one on, the determining official has one list, ideally, the point of sale system, is the source document, and that's what's getting benefits. But we do see that some districts utilize and have a very robust student information system. And may have antiquated point of sale system, so they are using their student information system to capture all of the necessary requirements for the benefit issuance document, and they may have that student information system speaks to the point of sale system on a nightly basis.

#### 1.02.51

So, again, we're just mentioning that there are different methods to be able to maintain a benefit issuance document, and you really need to, number one, just make sure you're not creating extra work for yourself by maintaining an Excel spreadsheet when you're able to retrieve that information directly from the point of sale system or your student information system. Okay, next slide, please.

#### 1:03:22

So, this has come up in just the past few years. So, we wanted to mention it in this presentation, and uh for new determining officials is to be good for you as well. So when developing your benefit issuance document, you want to see what is the current process. We work with your information technology person. Where are you maintaining these on the eligibility? This list, eligibility status. Does your student information speak to your POS system, make sure that your system is efficient.

## 1:03:53

Now, with the Direct Certification matches or the direct certification numbers uh really elevating it would behoove you not to have to enter that individually manually.

#### 1:04:09

So really connecting with our technology department to try and see how to uh complete that more efficiently.

## 1:04:19

And, really determine which then will be the list that you can use. So, you're free and reduced eligible numbers by school are entered, as I mentioned, into the monthly claim. So, as the determining official, you may not be the claim entry person, however, you would. You're still an integral part of that meal consolidation, because those free and reduced numbers, which you are responsible for as the determining official, are a big part of the monthly claim. So, we're gonna get into that later, okay, next slide, please.

# 1:05:00

So, ultimately, again, the point of sale system is where the students has the point of service, and where your client, you're accurately counting those free and reduced paid meals. So, that needs to be accurate.

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#### 1:05:14

If you are maintaining some sort of list outside of your point of sale system, There needs to be a process in place, that you are comparing, that the students in your POS system are accurate, and, you know, we have come across systems where the determining official calls over to the food service department.

#### 1:05:40

To tell them eligibility status, and there may not be any linking there with the with the determining official has doesn't have access into the POS system, So you need to make sure things are efficient and that our point of sale system is updated in an inappropriate manner so that is it. So we encourage you to work with your software network company.

### 1:06:13

This is if your, if your benefit issuance document your master list to enter that directly. So sometimes it's a lot of the management companies. They may have the determining official that doesn't work, part of the food service department, and, again, doesn't have access into that POS system. So that is allowed, they can, so you may want to allow that person to have access, and also making sure that that you're working with your software company, that all of the coding is, is available. When we're conducting reviews, I've come across some determining official said, no, no, we can put that code in, it's just, you know, we're only able to enter a student that's free, and we can identify if they're directly certified a written application. And then we've come to find that. There are fields that are open that you can use now, as I mentioned, over the past few years, especially with the Medicaid directly, certified via Medicaid, that is a drop-down for a number of different software company. So you need to work with your software company. You need to make sure that the system is working for you.

### 1:07:32

And work with your district's information technology department or IT person, they are there, they're also trying to work through and make sure that if you are using your student information system, as your master list, that it accurately connects them with your POS system to ensure that the students benefits are, are correct, and at the point of sale system, okay.

# 1:08:02

And, we're not seeing many of these examples anymore using an Excel spreadsheet, just because technology has really evolved over the past few years, and individuals who are in the roles now, as in determining official, are being, are becoming more and more comfortable with utilizing again, either the student information system, or the POS system. When POS systems weren't around then tickets and an excel spreadsheet, then you had an excel spreadsheet for your master sheets, but we're seeing this less and less, but if we are maintaining an Excel spreadsheet as your master list, and you do need to ensure that it's accurate and up to date and reflects the eligibility status of those students and that you are part of the claim consolidation. If you are determining official utilizing an Excel spreadsheet, you have the number of free or reduced eligible students. So you are part of that monthly claim consolidation.

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#### 1:09:11

And with that monthly claim consolidation, it's edit check worksheet. So, someone in your district is performing and edit check, and that edit check uses less Free and Reduced, paid on eligibility. And that needs to be accurate, so if you are not also preparing the claim, you need to reach out and connect with the claim, preparer to ensure that those numbers match.

#### 1:09:35

You know in this section, just because we have seen a number of different models with developing and maintaining master list or benefit issuance docent, we wanted to make sure everyone was aware, again, of the different options and just really looking at your process to make sure it's efficient. This may be not make a lot of sense for a brand new determining official. So, again, please reach out to your county consultant if you have any questions about that. And this overview of this link to the overview of the Meal Counting and Claiming Process will give you a nice picture of what I am speaking to.

### 1:10:16

It goes from determining eligibility to, you know, extending benefits for students, the meals, and then the claim consolidation, and kind of shows you the whole gamut. And where your role, if you are the determining official and not part of those other areas where you kind of fit in cells. So, I would encourage everyone, this is disclosed through probably eight steps: An overview of meal counting and claiming, just to take a peek at this, and kind of see what your role is, and get comfortable with, who are the other players in the district that would accomplish the other stuff that the meal counting and claiming profit, okay.

## 1:11:00

Alright, so, you're at the final stage of processing the applications, very exciting. You're ready to put this all away, and uh we wanted to take this opportunity to mention uh the federal regulations around how long you need to keep your records, so all records to support the claims. So, applications, benefit issuance documents, verification documents shall be retained for a period of three years, after the date of submission, of the final claim, for the fiscal year, to which they pertain. Except that if an audit finding has it has not been resolved the record shall be retained beyond the end of the three years, as long as it may be required for the resolution of the issues raised by the audit. So that it encompasses applications, benefit, issuance, document thru CEP on some of you may have set up schools and also process application for some school. So, we did want to mention that.

#### 1:11:56

For CEP you must keep all data to support the base year or the ISP data, for the duration of that.

#### 1:12:06

So you need to also check with your Board of Ed your town to determine if you have a stricter requirements for maintaining records on your town may maintain records for five, you require you to maintain records for five years. And, again, that would supersede, and you'd have to comply with that.

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#### 1:12:28

Okay, does your work ever get checked, I think I've mentioned this, but you, it does get checked, uh the district, when the households selected for verification, a confirmation review is conducted as part of Verification, before you would verify an application, which we're going to get into and at a different training. But there is an individual other than the determining official the chance that that process that application was processed correctly. Also, the State agency, when you are reporting in your FNS 742 uh those numbers, we are checking your work there. There's a lot of different edit checks that Teri performs before we can submit this to USDA, and so we're able to see if there's some issues, and we would reach out to you at that point during an Administrative Review. We do a deep dive into a sample of your applications, and we would, we are reviewing them extensively, and then also when an independent review is required.

#### 1:13:39

We're gonna get into that a little later, but some districts are required to have an independent review, and then determining officials' work will be checked at that point.

### 1:13:49

Beyond the Department of Education, we are aware that auditors are also hired by the town and Board of Education to conduct uh reviews, and we are, we have seen, in the past years, that on applications and looking at eligibility for free and reduced price meals is part of that town audits, so, your worker will be looked at there, as well.

#### 1:14:16

So, the independent review, which I just mentioned, requires districts that demonstrate a high level or high risk for administrative errors associated with certified certification to have another person, other than the determining official do a second review of applications. If you are identified to conduct an independent review of the applications, you are required to submit the report. And, again, you would be specifically notified of this, and an e-mail will come out from your county consultant to report on that data after the independent review was conducted.

#### 1:14:54

Next slide, please.

#### 1:14:58

So those districts that are at risk, if you are a brand new sponsor, uh you would be, we will be informing you that you'll be conducting an independent review. If you are a sponsor who has exceeded the error threshold of 10% during an Administrative Review, uh you'll also be notified or any other sponsor that we deem is at risk. We would notify you that you need to conduct an independent review of applications.

## 1:15:25

Alright, and just to move into some more forms we've talked about, your application, your media release, your notification letters, all of which are available on our Website.

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#### 1:15:42

And, then verification. All of these forms are required to be uploaded in your online application. Some of you may be responsible to do this, and some of you may not have access into the Child Nutrition Programs online claiming and application system. So you may need to work with the individual in your district who has access. I would, you know, start with the business manager, food service director, if you don't have access, because you will be supplying them with the forms that you are utilizing so they can be uploaded into the system. And we review those again. As part of the administrative review. We encourage you to utilize our templates forms for that. So we've pretty much covered most of these verification, As I mentioned, will be next week on that training.

#### 1:16:33

And then, next slide, please. The only one that we haven't really talked about was policy statements, so all sponsors must have one on file, with the Department of Education, and a copy on file at the district.

#### 1:16:48

So, it's found on our website under forms, and this policy statement is several pages, and it's, uh, as for determining official or just as a recap, it's great to read it over. It really kind of goes through all of the responsibilities. Teri mentioned that eligibility manual, few hundred pages in that eligibility manual for this, but this policy statement highlights the most important uh aspects of the LEA to local education agencies responsibilities with adhering to the USDA regulations around the school meals programs. So, it really speaks to the highlights the important areas. And I would encourage anybody who's new to school nutrition to read over this.

#### 1:17:37

Again, it's just a few pages, but you really highlight those areas that you really need to focus on, okay, and that is it for me if there are any questions, I'm not sure.

#### 1:17:54

Shannon, uh are there any questions?

# 1:17:56

Today, I was making sure actually got unmuted there uh so we do have a couple of questions, and I'll start out with one of my favorite ones, can explain what at FNS 742 is?

#### 1:18:10

Yeah, sure, I see, FNS 742 is the Verification Collection Report so you're going to have specific information about that. So we'll talk more about that during the verification training next week.

#### 1:18:26

If you are in the determining official and also the verifying official, I would recommend that you attend that training and that, we'll speak to the verification process, and also completing the Verification Collection Report, which is the FNS 742.

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#### 1:18:46

Thank you. Right now, right, I would say you need to know if you don't know what it is and you're the verifying officially.

#### 1:18:51

Thank you, and the reason it's one of my favorite says, because I have lived with the FNS 742 for quite a while, with my child care. So the next question is, can last year's application be used if it was dated after July 1<sup>st</sup>

### 1:19:10

I believe so that there has not been any changes in the application, but I'm gonna let Teri take that. Uh so if it was dated, Teri, are you on?

## 1:19:20

Yes, I'm on and I'm thinking, I think, well I don't know why you would do that, since because we have the new one posted that's dated for school year, trying to think, I don't think the income guidelines are anywhere on there, and there wasn't any significant changes, so you probably, could, but I don't recommend it, and just because you want to use the most updated information and, basically, if you are doing it, you're doing it without knowing whether or not it's in compliance. Do you know what I mean, without any updates?

### 1:19:56

So, yes because there was, there were no significant changes to it, Yes, you can use it for this year, but I would not recommend it in the future.

### 1:20:05

Okay, very helpful, thank you, and then we have one other question for oh, sorry Fionnuala, did you want to add to that?

#### 1:20:12

Yeah. She doesn't say you can't, you can't have a parent, because there were no significant changes, and you can process it. If it's dated after July 1<sup>st</sup>, you can't ask them to complete a new application at this point, but Teri is right too, it's best practice to get the new applications up and ready, and, but, yeah, okay, that's it.

## 1:20:33

That was a great point Fionnuala, and just as a reminder, and I actually, for those of you who have not been in our program guidance section on the Department of Education's Child Nutrition pages, we have revised how we display the information, for the applications, the templates, the resources you can find. So, it in the hyperlink that you use to access that document, it says right in the hyperlink when that was last updated. So, that helps you without having to look through any more than one link, which will be the most current version. So, if you look at what you have, and then you look at what our website contains, you should be able to quickly compare whether or not you have the most up to date version of all of these forms.

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#### 1:21:22

Our last question for this section Fionnuala is, if we are working with our IT Department for reporting purposes, do they need to have a signed disclosure release form for the IT person that they are working with?

#### 1:21:38

So, with the recommendation to work with IT, it's not to give them the free and reduced eligible information. It's to ensure that your processes is efficient when you look at your systems and your software programs that you're utilizing to, house this information. So this is not a case where they're asking for that information or to use that information, so we have not required any sort of disclosure uh for the release of the free and reduced information because you shouldn't be releasing them to them. They have you know regulations. The data manager in the system that enters into information into the PSAs system. Again, that is a required component for reporting purposes. You don't have to have assigned disclosure release for that, so my answer would be no.

### 1:22:34

But again, be aware that you are working through the process to ensure that the data is being retrieved and communicates efficiently with the different software programs that you have.

#### 1:22:48

So, you shouldn't be giving the IT Department uh use of the free and reduced eligible information.

#### 1:22:55

That being said, I don't know if this was brought out, but, because there are many different programs, and we know that the Student Information System has the free and reduced eligibility of, or the students. Because it's reported again, into the Department of Education. I believe, twice a year. Those fields or that field should be closed off for any other user in your student information system, So principals, and teachers, and we have communicated that out on the past several years as us, as we have become aware of more users that have access into these systems. And so, I'm answering your question, and then just taking that one step further, because you made me think of that. So, hopefully that answers that question.

#### 1:23:42

Thank you, and we did have a couple other questions come in so, somebody asked if there's a link for the verification webinar that we had or that we are having next week?

# 1:23:54

So we are continuing the information was contained in yesterday's school lunch. I will see if there's a way that we can put the link to register for that in this chat box, as we're going.

#### 1:24:06

I know we have some limitations on the number of handouts we can put within this webinar, so. We'll see how we can get that to you otherwise, and we will be sending out reminders with that registration information.

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1:24:22

And Shannon, I'll send out a reminder tomorrow to everybody.

1:24:27

Wonderful, well, that makes it a lot less complicated on this end, so thank you. So the other, question is in regard to online application services, the software requires parent account and unique activation code is this valid?

1:24:48

Not entirely sure? Not sure what that means? So what I'm gonna do is encourage this person to also reach out to their county consultant or to their school nutrition consultant, just to make sure that what you're doing is valid, and then I will hand it back over to Teri who sounds like she's going to answer that.

1:25:03

Fionnuala did you want to answer that? I was just going to re-iterate what you said with any online applications.

1:25:14

You need to have, give access to the parents to be able to obtain that application also a hardcopy or some sort of way to be able to mail it to them or to do that.

1:25:26

So, regarding uh the software requiring a parent account, I'm sure that there are many different processes, but there has to be some sort of account with the parent to be able to have a unique. I'm not sure of the unique activation code but for them to be able to sign an online.

1:25:46

So, we have seen a number of different software requirements with parents, and, again, I, maybe I'm not answering this question because I'm not 100% sure of it, but you do, Teri do you need to just reach out to them for me? If we don't answer the question? I'll be happy to research it and answer for you.

1:26:08

Great, thank you so much, thanks Fionnuala.

1:26:12

Alright. So that is the end of the questions that have come into this time period. So, I will hand it back over to you guys.

1:26:20

We're going to do a poll, I believe, and then we're going to break for 10 minutes.

1:26:26

Alright, I can walk people through the poll if you'd like.

1.26.28

That would be awesome. Thank you. Of course.

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1:26:39

Alright, so, what was the cost for lunches provided by the STARR Center Association in 1894?

1:26:46

Please go ahead and answer, these are supposed to be fun. We're not rating you on these, we are not rating you on these, and certainly we'll just leave this open. We're going to take a quick I believe 10 minute break. Is that correct? We're going to take a break, we're going to take a 10 minute break, so, everybody, make sure you get up and stretch get some water, and we will be back at 10:40.

1:27:09

No cheating on the poll it's for fun. Thank you, everybody, we'll see you at 10:40, and we'll see what the answers are for the poll.

1:38:03

Welcome back, we're gonna go ahead and get started. I hope you enjoyed your break and we're going to close our poll and see what this answer is, and then I'll give you a little bit of a background on it.

1:38:19

Do you want to know the results, Shannon, or yes, you can post those, that would be terrific.

1:38:25

I'm not sure, maybe when I'm posting it shows among.

1:38:28

I'm not sure you'll have to let me now, but right now it's 56%, chose one 3%, 50%, 38%, 6%, and 2% chose 37.

1:38:45

That's great that I'm looking for, cannot find my little fun fact on this, but 1% is the correct answer.

1:38:56

So, what I learned about this was that this was actually, they're all right. Here we go. So, the Children's Aid Society of New York initiated a program in 1853, serving meals to students, attending the vocational school, and then, in 1894 STARR Center Association in Philadelphia began serving penny lunches, and, one school, later, expanding the service to another. Soon, a lunch committee was established within the Home and School League and lunches were extended to include nine schools in the city.

1:39:29

So, I just wanted to share a little history about the roots of these programs, and a fun way. So, with that, I will transition over to Susan Alston.

1:39:41

Hi. So, now we're gonna be talking about direct certification. So, we talked about some of the applications this morning, and now we're gonna get into direct certification. So, some important

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terms that you want to remember as we're going through the next slides on the area one is categorical eligibility.

# 1:39:59

So this is when a child is automatically eligible for free meals or free milk, because he received assistance programs for benefit.

## 1:40:09

It also includes when a child is determined individually eligible through and other source categorical eligible designation. So categorically eligibility may be established through the application process or through the Direct Certification process. And we'll talk more about those as we move through.

#### 1:40:31

Assistance and programs include: Supplemental Nutrition Assistance Programs, which we call SNAP, formerly known as Food Stamps, and also temporary family assistance or TFA program.

#### 1:40:43

One of the things as we talk about this more, that you'll want to always remember, is that free eligibility is extended to all children in the household. And these children are considered to be directly certified in the same category.

## 1:40:56

And we'll keep reiterating that back every time we kind of talk about this, but you want to make sure that you remember that this is a one of those things that you want to always keep in mind.

### 1:41:11

What is other source categorical eligibility, so these are categories which make children automatically eligible for free meals, either through a direct certification or application because these children are either enrolled in a federal Head Start program, they could be enrolled in a state funded pre-kindergarten class that has the same kind of criteria as a federal Head Start program. They couldn't be determined as a homeless child by the school districts homeless liaison or a director of a homeless shelter.

#### 1:41:42

They are determined a runaway child who's receiving assistance from a program under the Runaway and Homeless Youth Act, as identified by their local liaison at the school and also determined to be a foster child care placement is the responsibility of the day. Or that is formerly been placed by a court with a relative or other caretaker, the state retains legal custody of the child. And that's something to really remember about a foster child, is that in order for them to fall into this category, the state has to retain legal custody of the child.

#### 1:42:18

A child's eligibility for meals does, under other source categorical, eligibility does not extend to any other child in the household.

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#### 1:42:26

So, like we talked about before with people who are SNAP and TFA that extends to all of the children in the household. The five that we just talked about do not.

#### 1:42:40

So, what is Direct Certification? So direct certification is determining children eligible for free meal benefits, who are not subject to verification based on the fact that you have obtain documentation from the appropriate state or local agency, or other authorized individuals. The purpose of the Direct Certification is to remove the household from the process. So this communication exchange to directly certify a child is coming between the appropriate agency and the school. So in this case here, and you're curious, it's coming from the State Department of Education to you.

#### 1:43:17

Homeless runaway or Head Start children are other sorts categorically eligible, and are also considered directly certified, as long as list of eligible participants are provided by officials of these programs.

## 1:43:32

Homeless runaway Head Start and Foster Children's Free Eligibility does not extend to other children in the household. So I'm going to keep reiterating that, you want to keep remembering that. It does not extend.

#### 1:43:43

Children that are directly certified, do not need to submit an application, and they are not subject to verification.

#### 1:43:53

So how can a child be sort of directly certified? So the first way is that their name appears on the direct certification list, and if you're not familiar with what the direct certification List in some future slides, we will kind of show you what it is, how to access it, and what it what it looks. So first, their name appears on the direct certification list and with their name would be some initials together that stand for different things.

#### 1:44:20

So if they are on there with an FS designation, that's mean SNAP benefits, if they have the AF, designation, they are receiving TFA, or temporary family assistance if they have OT, that stands for foster or other. In our case, the only designation as an OT would be would be for a foster child because currently homeless runaway or Head Start are not have provided category that we get information for. So, if they're on the list as OT it would be for a foster child. Foster status is merge monthly with DCF into that list. So, they may not be updated as frequently as children who are receiving the FS or the TNAF benefit.

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#### 1:45:04

If a child is listed as FS or TNAF, remember, free benefits are going to be extended to all. The children in. The household extension of free benefits does not occur for anyone who is on the list with the OT designation.

### 1:45:19

For verification purpose, you want to make sure you track the different system than if you attend the training next week. We'll explain why it's important to start off tracking this properly, so that when it comes time to report on the specific groups, you don't have to then go back, and make sure that, you know, or update your lists to have all of these specific designation.

### 1:45:49

A child may also be directly certified through the homeless liaison by them providing you or the determining official with an updated list of all students that are homeless or runaway. This list must be signed and dated by the homeless liaison, and this is a great time as you start to process applications for the New Year or the first week of school, to find out, if you don't know who you're homeless liaison is, and ask them to provide you with the list of the students that they have designated as homeless or runaway.

#### 1:46:17

And that would be your proof, that, to you to approve, to extend those benefits to that child, and be making them to read directly certified for free meals. The list must be signed by the homeless liaison, must be dated, and must be current for this this year. So you don't want to use last year's list. If you have that, you want a new list every year, and you may reach out to the homeless liaison many times during the school year, or you may just kind of develop a relationship that you, she, they know, that if they have a new person, that they're going to add to their list, that they send you the required information that you need so you can get to that child.

## 1:46:58

Also if there is a, go back, one, Teri, sorry. Also, the director of the federally funded program. So, if you have Head Start or a program in the school that has those same requirements, you would want to get a list of those students and from their person or their head of the Head Start program to give you a list of the enrolled students that are in that program. Again, the list must be signed and dated.

## 1:47:26

This is going to be your documentation that you are going to use so that you can extend those benefits and proof that they're in that program, and are eligible to receive a free benefits thru Direct Certification.

#### 1:47:43

And the last one, a way a child may be directly certified is through an LEA point of contact.

#### 1:47:49

And this is the person that is overseeing a foster children that may be in the district. So this person is working with the Department of Children and Families to provide the school district's

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information on students who they may have placed, that are now going to be attending school. So, again, you would want to reach out to this person, find out who they are. Have them provide you with the list of students that they are designating to be foster in the district, so that you can extend those benefits to that child. Just remember in this category, free benefit, does not get extended to the other children in the household, but it does for that child.

#### 1:48:31

Another way, Medicaid, so students may qualify for free or reduced meals if they are eligible for Medicaid.

#### 1:48:38

So the SDE, as it has been fortunate to participate in the Medicaid demonstration grant with USDA, to directly certified children for free or reduced meals, if they are receiving Medicaid, or if they have applied, and they meet the eligibility for Medicaid and for this program. So they list the children in two different ways. They might be listed as FM, which is Free Medicaid, but this would be for your eligibility extends to all children in the household, or Reduce Medicaid. So, the reduced price eligibility also extends to all children in the household. For verification purpose, you must track all, you must track the differences, again. So, free, you want to make sure they're for FM, if you're tracking and RM for reduced Medicaid.

### 1:49:39

So, as you're moving forward and you're working with your direct certification list, you want to make sure that you determine who the identified person is in the district, alright, so as we talked about, like the homeless liaison, your foster point of contact, they may be the same person, they may not be, so, find out who these people are, develop a relationship with them, set up a process for them to work with you to determine these students as they become identified.

#### 1:50:08

Alright, so important points term for direct certification with Medicaid that you'll want to remember.

### 1:50:14

Households that are directly certified based on Medicaid data, are not required to submit an application for school meal benefits, and are not subject to verification.

### 1:50:24

So, these are the codes, this is a great little cheat sheet later to print out from your PowerPoint and keep it by you when you're extending benefits to children in your point of sale system. And so FS SNAP benefits, free benefits extend to all children if they're AF extends to all children, OT, free benefits do not extend to all children the household.

#### 1:50:47

If their FM extends all household, and if there are, and Reduce Medicaid reduced benefit to all children in the household. We get a lot of questions about this all the time. So if you keep this little chart handy, I think it will come, it will benefit you through your process.

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#### 1:51:06

Important PowerPoints for Direct Certification with Medicaid. So, a lot of parents will have questions about this, so this is kind of good information to use if you're answering those questions. So, due to differences in household, household definitions and income assessment, some children that are directly certified as reduced Medicaid could also be eligible for free meals if the household submitted an application.

### 1:51:29

Therefore, districts must give the household the opportunity to apply for free benefits if a child is directly certified as reduced Medicaid.

# 1:51:39

So, if someone has Reduced Medicaid, we have a letter on our website that you can use to notify them that it also gives them the opportunity, because through their income that is reported on a paper application, they may actually qualify for free meals, so that's why you have to give them that opportunity to apply for that.

#### 1:52:02

A child status as Reduce Medicaid cannot negatively impact their eligibility if they had been determined free by the district application, homeless liaison, head start director, or a foster child. So if you've already have a status for that child, or through a paper application that has made them free, you would not then use that, Reduce Medicaid and switch them to the lesser of.

#### 1:52:30

Also, the district's determinations supersedes the Reduced Medicaid status. So she said the same thing in a different way, right? So if you had they had free, you're putting them for free based on application, you would not lower their benefit based on them appearing as reduced Medicaid direct certification.

#### 1:52:51

Medicaid and the Community Eligibility Program. So, once a year, and we ask you to kind of report this information to us for community eligibility, to see if schools are eligible and also, if you were to further apply for community eligibility sometime next summer, you want to make sure that you remember that, that you can use your Free Medicaid students in that district, in your district, or your schools identified student percentage, but Reduce Medicaid do not get counted, and do not count towards the ISP. Sometimes we have people, you know, reporting, I think I'm eligible to participate. We'd like to, and then we come to find out who develop their Reduce Medicaid students in that, their total numbers, and we pull them out and their not and so remember that as you're going forward. Or if you forget, but you're not sure when it happens, you can always reach out, and we will do our best to remind you.

#### 1:53:50

Some other things that you want to remember with Direct Certification, so there is a hierarchy of eligibility and certain considerations when allowing the point of sale software to override a determination. So a lot of districts are able to import their direct certification list right into their software system, and then it assigns those benefits to the children. So, as you're doing this, or if

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your software is able to do this, you want to make sure that is the hierarchy of eligibility is in place so that students are given the correct designation.

#### 1:54:27

Eligibility for SNAP or if they're on the list as FS will supersede all other eligibility category for that child, a Medicaid match should never overlay an existing Direct Certification match with another allowable program category.

#### 1:54:43

So, if they were on the list as SNAP, TFA, or OT and then they come on the list as free Medicaid or reduce Medicaid the system should not allow that to overtake the designation of FS for a FT or OT AF or OT.

#### 1:55:06

Districts must identify and Medicaid match only when the child does not have SNAP, TFA or OT designation, alright, so the hierarchy is as follows: So it's FS is the highest right, AF, OT, FM and then RM.

## 1:55:30

An example of a hierarchy of eligibility, so if a student is categorized as reduced Medicaid, and the latest direct certification file now has the student characterized as AF, student's eligibility would change to AF, and this would extend to all children in the household, and this is because the AF status in the hierarchy is above RM.

### 1:55:57

So what happens if a student's name appears twice on the direct certification list, and we know that this to happen?

#### 1:56:04

This may occur because DSS has issued two client IDs for the same student. So they may have one ID for SNAP benefit and one ID for Medicaid or husky. So when this happens you want to remember the hierarchy and give the child the highest benefit.

## 1:56:23

So what happens if a foster child OT on the list name appears twice on the direct certification list? This may occur because the SNAP and TFA data comes from DSS. And a Foster child's Data is issued by DCF, so again, remember the hierarchy and give the child the highest benefit.

#### 1:56:47

Okay, so now we're going to pause for a moment, and we are going to answer questions, and it seems like a bunch have come in.

### 1:56:55

So, and I was ready with my unmuting abilities, awesome. We do have quite a few questions that came in, and I might hijack a few of them since I love talking about direct certification as well.

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### 1:57:13

That would be fabulous. Let's go back to, and we do have a little bit of clarification on looking for the question that was answered previously about allowing a parent to sign in, or allowing a parent to sign in to the, to be able to fill out an application online.

### 1:57:33

And so the question is really around, should, can, are they allowed to have parents, have parents to sign in using a security, a security account, with an activation code? Or is, or do they need to be able to allow them to fill in the application without having to sign into something?

#### 1.58.01

I know that was a little bit off the topic of direct certification, but I do think it's an important one to cover.

# 1:58:10

Susan, can I say something? Yes, please do. Okay, I think in that instance, I haven't, I think it's important to have a log in and password ID, and I think that they have to work with their software company, to ask, you know, why that's required, and I'm sure it's for secure reasons, and if they don't need a login ID and password to access into the system, what exactly does that mean? Can other people get into their account and see. I mean they're putting their social or the last four digits of their social security number. They're putting their income. There's a lot of personal data in there. So if they don't have a login ID and password for each individual, parent that's going to be signing in.

# 1:58:54

It could it could create problems. So that's something that you need to talk to your software company about, and you also want to talk to your administration, if they say it's not necessary, to make sure your administration is not worried about the security of the information that's being provided by the parents.

### 1:59:13

Thank you so much, and sorry Susan Alston I should have uh let Teri know, and for those of you who wonder why I call Susan Alston by her entire name, it's because we have several Susan's on our team, and I'm sure you're familiar with that's out there. They all go by their full names. Yeah!

## 1:59:30

All right, so just one other quick question, Teri so I'm going to throw this one also to you is, for one of the questions is, how can a district ensure that the income guidelines are updated inaccurate for each new school year? For the purpose of entering income application, when using those when using a software company?

### 1:59:52

If you're using a software company, you need to work with them through the summer to make sure that not only the income eligibility guidelines are updated, but also that all of the forms and the parent notification forms that might be produced by that software company are updated. So,

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that's how you would you have to work with your software company, to make sure that those annual guidelines are put up there and updated every year.

#### 2:00:22

Great, that's so helpful. The , so one more question before we switch, before we transition right into these direct certification questions so, and this is a good segway question. Can we have Addend C and the free and reduced price application on the school website in lieu of sending it home in paper form?

### 2:00:43

And I know we have, yep, go ahead, oh no, that's a great question, and the answer is no. You can't post it on your website in lieu of sending it out to the parents. You need to send it out to the parents, and you can also post it on your website.

# 2:01:00

Great, thank you so much, so, alright Susan Alston you have a lot of questions. I wanted to give you a second to be able to look at those. So thank you, team, for being used to how I, how my style is.

#### 2:01:12

So do you, can you tell us, can a determining official also be a homeless liaison for the district?

#### 2:01:20

I would imagine, so, I mean, the USDA does not have any designations of, you know, like they do with the, determining official and verification officials and hearing officials. There's no designation like that, so, if the district did assign the homeless liaison responsibility to the person, that was also the direct determining official, that would be fine!

### 2:01:43

Then, the list or documentation for those children would still have to have the same type of documentation, a list, signed by the determining official slash homeless Liaison.

#### 2:01:57

Thank you so much.

# 2:01:58

Alright, so, I believe you answered this question, but it's probably worth just stating again, and that is, this, is in regard to that hierarchy. So, if a child is, is on that direct certification list, certified for reduced price meals, but they send in an application that qualifies them for free.

### 2:02:20

Which direction does the district go?

# 2:02:23

So, right, so, yes, they would be qualified for free in that case. So, if they are on reduced Medicaid, or they may come through the direct certification list as reduce Medicaid, have to give that that family or household an opportunity to complete a green reduced application that then could qualify them for free meals. And if they do qualify based on income the income guidelines

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and you are going to make them free, then that over overrides The reduced Medicaid through Direct Certification, but then they are no longer consider Directly Certified, right. So they would be then free through eligibility through a paper application.

# 2:03:06

Thank you so much. I'm going to group a couple of these questions together around the, how to interact with their homeless liaison. So one of the questions is really around what do you, how do you find out who your district's homeless liaison is? Then, once you find that out is, is an e-mail from that homeless liaison verifying that the child is certified or is determined as homeless? Is that sufficient for the determination of the direct certification benefit or do you need something signed or a little bit more formal?

### 2:03:42

So, yeah, so I'll start with the homeless liaison and where you can find them. So, you can do you know, you should be talking with people in your district, but if you are unable to do that for whatever reason, we do have a list that you can get through it through our website. It's not mean chained by us but provided from the person who over kind of oversees that whole section of the school with the homeless liaison. So, it is up to date, I think, as they have it, but you would be able to go on that list link for our web page to see who the list is for each individual, school or district. Yeah, I'm not sure all schools have them. Or if there's one, there's one per district, but you would need to kind of look into that.

### 2:04:28

And then the other piece is, so, I would say, and Teri, you can correct me if I'm wrong, if they did send an e-mail, you know, as long as it, you know, when you want to be able to be able to print that out, and to have the date on it, a date stamp coming from that first e-mail. Sign, but that person, you know, in the, their signature part of the e-mail box, I would think that would be OK, especially now.

# 2:04:54

While in COVID times when you may not be in the office as much, or having direct contact with these people know that you're working with, e-mail is fine, you're right, okay.

# 2:05:07

Thank you.

### 2:05:09

Great, thank you so much. So, I'm going to, I'm going to take the first stab at this next question here and certainly team jump in and provide some technical assistance to me if I get this a little bit fuzzy. So, if, if we're providing the, if we're doing non congregate meals and providing meals for Grab and Go for this next school year underneath those nationwide waivers that we are able to authorize districts two years under COVID.

# 2:05:39

When you talk about that direct certification is in that extend conferring eligibility to every other child in that household. The question is, really, are we able to feed every child in that

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household? Do we need to provide those meals for all the children? And so, I am not sure if folks were able to jump in on our town hall yesterday, but we do have those town halls that are from moving forward, starting next week from 2pm to 3pm, every Wednesday, and encourage you to join those. We are going to be talking through some of these issues with the new ways of serving this year. And so, the answer is that it's very different than what it looked like from last year during when. Everything shutdown mid-march, and we were able to switch into summer meals operation, and then many, many districts were able to serve all of the children in the household this school year, even though it's a very nontraditional way to serve children through these noncongregate meal.

### 2:06:37

We're still under the regular School Breakfast and School Lunch Rules, in terms of who you can serve, So, if every child in that household is enrolled in a school that you provide school breakfast and school lunch for, then, yes, that you would need to be able to offer those grab and go meals to each child in that household.

## 2:06:57

If, however, all of those children do not attend the school district, or schools that you're providing school breakfast or school lunch for, then you would only provide meals for the children who are under your sponsorship agreement for school breakfast and school lunch. If the other children are not attending school or not school aged yet, then you would not be able to provide them reimbursable meals, and claim those for federal fund.

#### 2:07:27

If you guys want to add on to that, certainly feel free to go check, yep.

#### 2:07:32

Sounds good Shannon, all right, that was good with my team, says I'm right. So, what if the list received one student who is free, who is free due to their household participating and SNAP and then received another sibling who had a different last name, who was certified under Reduced Medicaid.

### 2:07:57

Are they both eligible for free meals? Or does one get free meals and one reduced? Yep, so in this case right and we know that this happens to children are on the list we know that their siblings because they're in your district, they may be in your student information system under the same household in the same family. So, yes. So the hierarchy would be in play in this case the ones on as FS and one is on as reduce Medicaid you would make both of them FS.

### 2:08:30

Thank you, I'm going to take this next one as well.

### 2:08:35

As for Medicaid benefits, though, is that really what is that program in our state? So, there's four different types of HUSKY, HUSKY A, B, C, and D.

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### 2:08:47

Medicaid is only applicable to HUSKY A, HUSKY B is our State Child Insurance Health Program, and that does not code for any sort of categorical eligibility for Direct Certification.

### 2:09:01

So, you keep in mind HUSKY A, there is a benefit income different income threshold difference, and unlike the other categories, if it works a little bit differently since this was a demonstration project that allowed Medicaid to confirm Direct Certification, And so the, the Income Eligibility differences is that you can have up to 203% of your of the Federal Poverty Level, and still be on HUSKY A, you will receive some children, who are in HUSKY A, who may not be income eligible, and they should not be. They won't show up on the direct Certification List, but you might hear from those parents saying, hey, my child receives HUSKY A, why am I not getting it? And so, that's, oftentimes, so, and Medicaid, is this extended able to the whole household? Yes, it is, so, whether they're on as Free Medicaid or Reduced Medicaid. Medicaid extends to all households members.

### 2:10:05

Wonderful, so can you talk a little bit, just about how, when somebody presents their benefits letter to the school? But the student has not shown up on the direct, and the Direct Certification List? Yet, are we allowed to be able to use that letter to determine that the child is, is eligible for free meals? Or do we need to wait for them to jpg on that direct certification list? Okay, yes, I think we're going to talk about this a little bit, and that's some of the upcoming slides, but yes, you would. So, what, what we would advise you to do, right, a student or family completes an application, they send it in, they may indicate on that application that they are receiving SNAP benefits. And they may put a number down, and they also attach their letter. The first thing you're always going to want to do is to check that, that student is on the list. In this case, they're not on the list.

# 2:10:55

So, then, you could use that letter to verify that they were, and now there's information that you're going to have to look for on that letter, and we, I, I believe we do talk about that.

### 2:11:04

So, I'm not gonna get into that, but as long as it has a specific information that we're looking for, you would be able to use that letter that they provided to extend that free benefit to the child.

#### 2:11:18

Thank you. Shannon in regards to Medicaid, as you indicated, not all children that are receiving Medicaid may show up on the direct certification list as free or reduced Medicaid.

# 2:11:29

And so sometimes determining official's will get questions from the parents because their child's receiving Medicaid.

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### 2:11:36

Remember this is the only way that a child can be direct certified is if we certified as free or reduced Medicaid, if their name shows up on the direct certification list, and that's part of the demonstration grant. There's no other way, so, if a parent brings in a letter, free Medicaid letter or anything, you cannot accept it. The only way is if their name shows up on the DC list for Medicaid.

## 2:12:03

Right. But, but, if they're, they're saying they, they are, at SNAP eligible, then a letter, they can be, and we'll talk about that. Correct. On that.

# 2:12:16

Well, and I know we're gonna cover some of this, some of the questions, that came in on the next section. I'm just going to ask one more of these questions. And that is until we're able to go through the next section, as I think some of them might be answered at that.

# 2:12:29

So the, so this one's a little bit tricky, and I know it's one that comes up quite a bit. So in this circumstances, in joint custody, if one parent completes the application and does not qualify for free or reduced priced meals and the other parent applies and does qualify for free meals, how should they handle that?

### 2:12:51

We're gonna cover that in a little bit. We have some slides about that, so we're gonna cover joint custody, and it's been a little bit.

## 2:12:58

OK, so let's move on from the questions, and we will hold these, and I'll monitor them in case there are ones that we don't cover in the next section, and then we can make sure that we bring those up again.

## 2:13:11

Thanks so much, Shannon, of course. So I'm going to take over and talk to you about Direct Certification Notification.

# 2:13:22

And I talked a little bit about this earlier, but I need to mention it again, you must notify the household and writing anytime you approve a child for free or reduced priced meals, and this includes when you approve them based on Direct Certification.

### 2:13:37

And there is a Direct Certification list, and each sponsor has one designated direct certification contacts who can access the Direct Certification list online. On the access is on our State Department of Education website, here is the link, there should not be more than one person due to confidentiality reasons.

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### 2:13:56

It's updated, the list is updated every Monday or Tuesday if Monday is a holiday, and the match the State Department of Education matches the student enrollment that's on file.

### 2:14:08

We're the State Department of Education with DSS, SNAP and TFA benefits and also Free Medicaid and Medicaid Reduce.

# 2:14:16

Direct certification contacts are required to access the list weekly to ensure that the children that are eligible are awarded the benefits, okay.

# 2:14:29

This is what our website looks like, and there's a whole page that's dedicated just to Direct Certification, itself, and this is where the Web application link is, and you'll see over to the left, the docents and the forms.

#### 2:14:44

And if you click on the documents and forms, you're going to find all kinds of information about direct certification, including Medicaid, important points for direct certification with Medicaid, because Medicaid is its own area.

# 2:15:00

Important reminders, there's a manual there if you're a private school, because the Direct Certification process for a private school is different than it is for a public school?

## 2:15:12

We want to remind you to always check case management. At this time of year, you may find a lot of students that are in case management, and students would be put in case management. If there was a possible match, but the State Department of Education and DSS when they match the information at what they weren't quite sure, so they put it in case management. And then you look at the information and decide whether or not that child should be matched to your school district.

### 2:15:41

So private schools and RCCI may have a different method, and they have to refer to the manual for private schools in order to directly certify their children.

### 2:15:50

And you always want to check the statewide search to locate a child if you have a question about it, or if you think they may be directly certified, we do have that convenient link. So that way you can search any child on the statewide search.

#### 2:16:09

If you find a child in a statewide search, make sure you do a screen shot, and this is really important.

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#### 2:16:15

Remember, slide 99, if you find a child in statewide search, do a screenshot, printed off, and put it in your folder of kids that are approved. Because there may be a chance that they don't show up later on, and so you want to have proof that you have directly certified them based on the statewide search.

### 2:16:36

So we've already started to match, the big match happened, if a student's name doesn't appear on the new list. And if the student was directly certified in June of 2020, then there was a carryover of their status for 30 operating days from the first day of school or until their name appears on the new school year direct certification list, before the end of the carryover period. And I know this question was asked earlier, and this is the slide that addresses it. If their name does not appear on the new school year, direct certification list by the end of the 30 operating day period, and their status will change to denied, and the household would need to submit an application if they wanted to see if they were eligible for free or reduced price meals.

## 2:17:23

Now, a question if a child was directly certified as free Medicaid in June, and their name shows up on the direct certification list in August as reduce Medicaid, what do you do?

## 2:17:35

Change them to reduce Medicaid and extend benefits to all children in the household, or do you keep them as free Medicaid for the 30 operating days from the first day of school in case their name shows up on the DC. List?

### 2:17:47

The answer is you change them to reduce Medicaid. And you extend those reduce benefits to all children in the household. Because based on the new information for the new school year, they are now reduced Medicaid and you need to make that change. Is there a chance they may show up later on as Free Medicaid or a SNAP or TFA? Yes, but based on the most recent information that you have, you have to change them to reduce Medicaid in this situation.

# 2:18:20

So the reduced Medicaid would override a free status carryover from the previous school year during the 30 day carryover period, and I state the federal regulations, which you have there as a reference.

# 2:18:36

Now we want to want to remember that the data is only good as what the district enters into the PSIS system and what the parent includes on their application. SNAP per TFA benefits and what DSS processes.

### 2:18:48

So, sponsors with inter school agreements and this is very important to must be able to batch those additional students with a direct certification list if they are proving the free and reduced meal applications. So this means that you need to receive another login ID and password from

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the other school or district security manager in order to access it. And that school needs to give you permission to have that data. And following the private school Direct Certification procedures to upload the private schools as many of our private or public schools are serving private schools via an interschool agreement.

### 2:19:25

So, you want to make sure that you have you follow those procedures, because it's different than what it is for the public school, when you do direct certification of public school system.

### 2:19:39

Schools should be updating their enrollment by July first of each year, however, you have until September 30th to conduct the summer rollover, and the thing of it is, is that the later you update, your district updates their enrollment. This could definitely impact directly certifying students.

# 2:19:56

Because you may see on your August run, for example, the first week that there were students that were graduated that showed up on your Direct Certification List. Well that happens, because this, this school district did not update the enrollment yet, and so those students were listed and got merged into the Direct Certification System.

# 2:20:22

So, therefore, our schools must match total enrollment with a direct certification list every week.

#### 2:20:28

You don't look just at what, who was directly certified this week and merge it into your database. You look at everybody who was directly certified from the very first match, which was last week, I believe.

### 2:20:40

And this will help to ensure that all potential's directly certified students are matched, students are not charged meals when they are actually eligible for free meals based on direct certification.

#### 2:20:55

Now questions about the Direct Certification website may be directed to our helpdesk, but remember that you don't call the helpdesk if you have questions about the Child Nutrition Program online system.

# 2:21:12

Now, if an application is submitted, and a child is directly certified, you disregard the application, but you don't throw it away, you keep it on file, and direct certification supersedes everything, unless it's a situation where they're, they're directly certified as reduce Medicaid, And remember, the more students that you directly certified means that smaller number of students need to be verified.

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## 2:21:42

Foster children are unique because there's a lot of different ways that a foster child can become eligible for free meals, and so, one is the household submits an application, paper application, or they do it online, and they indicate that the child is a foster child.

# 2:21:57

And so, this is not direct certification, and they are subject to verification if they are, if that application is selected.

## 2:22:06

And so, please remember that, in this situation, when you get an application and the parents or guardians checks off, that they are a foster child.

# 2:22:17

The determining official does not validate the foster child status prior to approving the free meals. You don't have to go and confirm that they are actually a foster child.

#### 2:22:28

If they fill out, the rest of the application is complete and it's signed and dated, then you would process it as a free application for that foster child.

### 2:22:41

Now, households have the option with foster children and non-foster children to include foster children as a household member, as well as any personal use income that the foster child earns, sometimes they aren't zero on the same household application as their non-foster children.

## 2:23:00

When the LEA processes the application, they would certify the foster children for free meals.

# 2:23:06

And then make the eligibility determination for the non-foster children based on the total income of the application and the total household number in that household, okay, and they will include the personal use income that the foster child listed or was listed for the foster child as part of that income okay.

# 2:23:28

As before, foster payments received by the family from the placing agency are not considered income and do not need to be reported it's only the personal use income, and many times that could be zero, and that's fine.

## 2:23:43

Now, this leads to a case where you have mixed households. So, basically, you could have an application that is determined for free, and reduced, or free, and paid, because you have a foster child, and based on the household size, and income, the other children could be reduced, or they could be denied, and that's known as a mixed household.

# 2:24:07

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And you have to be aware of that, and you have to be able to manage that information, your system has to be able to manage that.

### 2:24:18

Now, the parent, or guardian should only count foster children's income if they are applying for them together with the rest of the household. It is optional for the household to list foster children living with them as part of the household.

# 2:24:31

Foster children do not make other children in the household automatically eligible for free meals, okay, so, you want to take that into consideration when you're looking at an application with foster child.

# 2:24:45

Now, the other way that a foster child can be eligible, is if you're looking at the direct certification list and you see the code OT, which stands for other.

#### 2.24.55

And, again, this would mean that that child was directly certified as free and they're not subject to verification.

# 2:25:03

Another way is if the determining official obtains a copy of the current DCF 603 form or a state agency docent that demonstrates that a child is a foster child isn't in the care and placement of a state agency.

## 2:25:18

And is a legal awarded a state, that's another way that a child could be determined a foster child would be determined is eligible for free meals, okay, and some of your Special Ed programs, or they may have may have a DCF 603 form on file.

### 2:25:33

It needs to be current for this current school year, okay.

#### 2:25:40

Then, you can always go to the LEA Point of Contact, and they provide you a list of those students, and yes, it can be the e-mail.

### 2:25:47

And that would be confirmation that those students are indeed foster chat children for that school year.

## 2:25:52

There was an operational memoranda that was issued, and back in 2017, and that addresses all the details regarding the LEA, a point of contact that you can find that on our website under operational memoranda.

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### 2:26:09

A couple of things to remember that foster children that are adopted are no longer categorically eligible for free meals as foster child.

## 2:26:18

So, due to a year long eligibility for eligibility status of a foster child would not change within a year, including up to 30 operating days into the next school year if the child is adopted.

### 2:26:31

However, in the future, after that 30 operating days carryover, then that child would be expected or the household would be expected to complete a Free and Reduced meal application, okay.

# 2:26:43

So, for example, if this school year, a child was a foster child in October and then in May, they were adopted because there's a carryover of eligibility and you can continue their eligibility for the whole school year, that would remain free until the end of the school year, up until 30 operating days into the next school year.

# 2:27:03

But if that household does not submit an application, and it's not determined as free, or reduced, then they would be expected to pay, because they're no longer, no longer a foster child, okay.

# 2:27:15

Now, if it's a subsidized adoption, then they would need to include that subsidy dollar amount as their total income. So, just remember that as well.

# 2:27:31

Now, if the household of another other source categorically eligible child submits an application, the application program must be indicated.

### 2:27:41

And the LEA official must contact the other source categorical eligible agency liaison to confirm child eligible ability under one of those programs before giving the free benefits. So, for example, if you get an application, they checkoff head start, okay, they checkoff homeless. You have to go to the Head Start program director. You have to go to the homeless liaison to confirm that that child is indeed homeless are enrolled in the Head Start program. Before you make them eligible for free meals. You don't do that with foster children, but you do that with anybody else that's in the other source. Categorical eligibility category, okay.

# 2:28:27

Now, if a household submits an application with income and indicates other source categorical eligibility for one or more children such as they checkoff homeless or Head Start, again, you have to confirm the child's status before providing benefits.

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## 2:28:42

If you cannot confirm the child's status, then the LEA must process the application using the income information provided, and, I want to stop for one second, and just mention if you have as a determining official, if you have questions about the application.

### 2:28:59

You can always contact the person who signed the application to get clarification, just docent it, always can do that if you're an uncertain, if there's any questions, we encourage you to do that.

### 2:29:13

Now, with the homeless, or Head Start, status is documented for all children in the household, the determination, based on income as superseded. However, some children in the household are not determined other source categorically eligible. Income determination remains in effect for them, and the application must be retained in the LEAs records.

### 2:29:36

Here's a note about hand-written case numbers. Sometimes you're going to be getting an application and the parent or guardian writes in the case number under SNAP or TFA.

### 2:29:46

Whenever that happens, you must validate that number and you have to contact the household to do that unless you find them on the Direct Certification List.

#### 2:29:56

So, when that happens, the first thing you do is go to the direct Certification List.

# 2:30:00

See if you can find, the child on the list, and confirm if there are free or reduced, depending upon if they're SNAP or if they're reduce Medicaid.

### 2:30:14

If a child can't be directly certified, then you review the application for income. If the parent or guardian included income on the application, and if the income supports it as a free determination you process, the application is rate, okay.

# 2:30:30

This application would be subject to verification because you're basing it on income and you're not directly certified.

### 2:30:36

But if there is no income provided or the income makes the application denied, then you need to contact the parent.

# 2:30:42

Or you can send them a parent notification letter, saying that they need to provide proof of their SNAP case number. And they would do that by sending you a letter from DSS demonstrating that they are receiving SNAP benefits. You can't accept a copy of the Connect card, because they get other benefits on that card, okay.

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### 2:31:05

If they don't submit that required information, then they're not going to be paid.

# 2:31:11

Remember that when you read the card, you have there has to be a dollar amount associated. Not when you read the card, when you read the letter, there has to be a dollar amount associated with that letter.

# 2:31:21

So this goes into detail. The eligibility manual guidance goes into detail of this about on page 667 but you have to read the DSS letter and there has to be some sort of monetary amount that that parent is receiving from DSS in order for you to consider that child to be directly certified.

# 2:31:49

If the application has an income that is determined as reduced, but also lists a SNAP or TFA case number, the determining official must contact the household requesting proof of a SNAP number, and a client ID number, and if the parent or guardian does not provide documentation, then you would it would, you would process it and then you would give them reduced price benefits.

# 2:32:14

Remember, do not use the connect card or the EBT card as proof of SNAP or TFA benefits.

#### 2:32:25

Let's see, letters that you get from the household that are that are on DSS letterhead that provide proof that a household is receiving DSS benefits or TFA, that is considered to be Direct Certification. You would keep that on file, okay.

### 2:32:45

But, , the household must, for the purposes of reporting, for the verification process, you have to keep them separate, and you have to be able to code them as a letter, because USDA wants to know how many letters are being processed when they look at our verification data, which we're going to talk about next week, okay.

# 2:33:09

So just keep that in mind that you do want to have a code in your system for letters when you do receive them.

### 2:33:20

Do we have any questions? We just have a few that we're kind of running short on time, so we're going to do our best to take as many questions as possible, And I have, no, I'm not sure how many are out there.

### 2:33:32

So Teri, we do have quite a few questions here, but I wonder if maybe we should continue on and save this for the very end, in case there's additional ones that come in during that time, and then we can consolidate them into categories.

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### 2:33:49

That sounds fine, that's fine, so Shannon, I'm going to turn it over to Fionnuala.

#### 2:34:03

Okay, So, I'm gonna, click down two more slides here, and I'm going to get into applications, but before that, I just wanted to briefly go over overt identification. So if you can proceed to more slides, please, sure.

# 2:34:25

Okay, so we've mentioned overt identification, that's any action that may result in a child being recognized as potentially eligible to receive, or be certified for free or reduced price meals or free milk.

# 2:34:38

Next slide, please. It's important that the School Food Authority assures that a child's eligibility is not disclosed at any point in the process of providing free or reduced priced meals.

#### 2:34:53

So it's important that you look at all of the your process and ensure that notification of availability of free or reduced price meals. So when you're sending out applications, you cannot just send out applications to those children that received benefits last year that would overtly identify them, certainly certifying and notifying them of eligibility needs to be confidential, provision of meals in the cafeteria. So you need to be aware of monitor what's being said in the cafeteria regarding these students. You want to make sure cashiers, you're not saying, Oh, you're free and go ahead and okay, you owe \$3.

# 2:35:32

Again, we're just saying this, that you recognize that all of this information needs to be confidential and there's no overt identification, certainly at the point of service, and additional services briefly on, you know, I was at a district and years ago, and they gave out tickets, and, for free and reduced eligible student, anybody that was paying, or receiving meals.

# 2:36:00

And, they, it was something observing meal service and students came through, provided the tickets to receive the meals, and then there was a group of students who didn't have any tickets, and those students, they said had difficulty keeping and maintaining the tickets, and those were the students that were eligible for free meals. So, again, you just need to look at your process, you may have good intentions to make sure students are receiving benefits, but you cannot overtly identify any students, free and reduced status, and looking at the method of payments as well.

# 2:36:37

OK, so that's overt identification, and now if you could go back, Teri to the slide for no income.

# 2:36:51

Alright, so applications with no income, so on that application, parents are instructed to write zero in any field where is there, there is no income reported, any income field left, empty, or

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blank, will be counted as zeros. So if a household, right, zero or leaves any field blank, the parent or guardian is certifying or promising that there is no income to report. And officials that have information, other information available to them, always have the opportunity to clarify an application for cause.

# 2:37:25

Next slide, please. So, applications where no income information is provided are considered complete applications, and thus may be processed accordingly. If you could skip, next slide.

## 2:37:44

You can refer to Page 74 in the Eligibility Manual. This addresses the requirements regarding complete applications. And there are different. There are different requirements based on what type of an application and income application is going to require certain fields to be completed, whereas a parent or guardian identifying that a child receives, food stamps and writes a SNAP number would have another requirement, and the same with foster. So, page 74, you can see what exactly is required for those different type of applications.

### 2:38:25

The determining official may not complete the application for the household, using information derived from other records available to the school, so any missing information on the application must be provided by the household.

# 2:38:40

The LEA must not delay approval of an application if the household fails to provide any information that's not required. So, again, you need to be familiar with what's required, what's not required as if it is. Or if it is a complete application, it needs to be process. You cannot put higher requirements on there, that they didn't write the birth date, so you're not going to process the application or the street address. Those items are not required, so you need to be familiar with what needs to be on there before you can process an application. Because, again, you have those 10 days. If for the USDA requirements to process an application and extend benefits.

## 2:39:23

So we wanted to just briefly go over calculating income. We go over this, or run across this a number of times, you need to be aware, when you're processing applications, that no conversion is required. If all of the income listed has the same frequency, conversion is required if there are multiple frequencies of income, then you must annualize the total income.

# 2:39:48

So to annualize the income, it's right there on the application. So for weekly, would be by 52 biweekly multiplied, by 26, semi-monthly 24, and then obviously the monthly by 12.

### 2:40:07

This is just an example here, we have an application that came in, there's two different sources of income, \$500 a month from Peter, and then Mary has \$350, a month so would we need to annualize this income?

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### 2:40:26

The answer is, no, you just compute that it's \$850 a month. And then you will be looking at the household size Family of four, and your income guidelines would identify a family of four within a monthly income of \$850. Would tell you what they qualify for, which in here, would be reduced price meals, right, pre females management in here, yes.

# 2:41:02

And then again, just an example for when you would annualize the income. We have another 2 sources, John has a monthly income and then we have a weekly income. So this would be an example of when you would actually annualize income to calculate, to see if what they would have and that's an example of how you would do their monthly times 12, weekly, times 50, 2 and you come up with the Annual Income for \$33,860, okay.

### 2:41:37

So we wanted to just briefly mention on carryover we have some excellent resources for determining officials regarding the carryover and then also that as it compares to a transfer of a child's eligibility.

# 2:41:54

So we distributed this as a handout and we encourage you to uh review that if you have any questions regarding carryover and transfer and what are your responsibilities regarding that.

# 2:42:11

There's also a resource here, for overcoming the unpaid meal challenge, so we'd encourage you to look at that as well.

# 2:42:25

So USDA does encourage schools to provide households with the reminder that the free or reduced price meal benefits will end on a specific date. If the household does not submit a new application, or the school has not received, notice the child is eligible through Direct Certification. So, the reminder notice, also should include the cost of what paid meals and this can go out as a robocall e-mails, so this is, USDA does encourage this.

# 2:42:57

Regarding the carryover, if a child's eligibility expires, at the end of the 30 day carryover period, neither a notice of denial nor our notice of adverse action may be sent as both the notice of denial an adverse action provide the opportunity to appeal and there is no eligibility determination made during that carry over a period, and so there's no right to appeal or discontinuation of benefits due to the expiration of carry over a period so just wanted to make that point.

### 2:43:29

So we believe this question came in earlier. Regarding joint custody, we do receive this a lot. In joint custody situations, a child may physically, change residents regularly if both parents applying for benefits within the same LEA. The eligibility determination is different, but the eligibility determination is different. The greater benefit is used. So again, if a child resides, you

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know, two days, one family with one household, three days another, and they both apply, it's the higher eligibility would supersede for the five days.

#### 2:44:06

Uh one parent may elect not to hold, moving on. So, a parent could elect not to have the child have benefits. If there are split custody, joint custody, and those days where the child is residing with the parent or guardian, that's refusing benefits, you need to be able to receive payment for that child. And, yes, it is going to be difficult with the POS system, and you need to have a mechanism this process in place for that. Reach out to your county consultant.

### 2:44:43

If that is something you need help with, we don't see that a lot, okay, all right, this next form here is if you receive a request you haven't used with Addendum A, it was something you weren't aware of that accompany a group. A person was looking for the free and reduced eligible static eligibility status of the students, and you are trying to determine now if this is something you are going to be able to release. So we have created this form, this sample disclosure release form, and it's great because you will be able to have everything documented and kept in writing there, who's making the request, while the information is being requested, what will be used for. Next slide, please.

### 2:45:36

And then it is, it reviews the regulations around this confidential information and by penalty and misuse. So, really, it gives the individual who's requesting the information all of the regulations that govern this free and reduced eligible information and that they would only be able to use it if it is allowable for the purposes that they have stated in this form, and then they sign it, and then certainly, it speaks to the fact that they cannot then share this information with any other individual. So, again, we recommend that you have anyone who's requesting the information, fill this out, and then you would go through your process to determine if it is appropriate. And we're going to get into that. I believe in the next slide, there are certain circumstances where you can release the information without parent permission and you would need to refer to the eligibility manual for that.

### 2:46:38

So it's not an automatic. You need to refer to the eligibility manual and determine that you can disclose aggregate data to any program or individuals. So, again, that's not providing the specific eligibility status associated with children. It may be giving the total number of free and reduced eligible eligibility, numbers by school, or by district, so that can be released.

# 2:47:05

But the eligibility associated with each student is highly confidential. You need to refer to the eligibility manual for women is appropriate. And then we have that nice form to be able to have everything in writing, to go through that process and meet the regulations on your end. Can I disclose the eligibility status to a non-custodial parent without the consent of the parent who signs the application. I think we've gone over that. And, again, they're completing this application for the benefits of free and reduced price meals.

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### 2:47:37

So while it may be a positive thing to share the information for free laptops, for pre physical, that's not what the intent the parent was applying for.

### 2:47:51

And here's the great from eligibility manual, the persons associated with different programs that will you would need to, you're able to disclose the information without parent permission. So, again, you refer to this free and eligibility manual. If you need help navigating this, you reach out to your county consultant.

### 2:48:13

All right, and briefly about the cloud, where we have more questions regarding this, So you can use the Cloud to store student data, you are required to have a signed agreement with any entity that is in possession of the student information.

#### 2:48:32

Next slide, please.

## 2:48:35

So talk with your school administrator about the storage of student data.

### 2:48:39

You may already have policies and procedures in place, and you may want to make sure that you're in compliance with the district's policies before sharing that, okay.

### 2:48:52

I think we're going to continue to move on because I know we have one, at least one more segment to cover, and so we are folks who are entering questions. We are looking at those closely, and looking at trying to, to combine some of them, so that at the end, we can provide some information for you that will be good for.

### 2:49:17

OK, so now we're going to talk about civil rights. I just wanted to say, we're going to go through this pretty quickly, so that we have time to do the questions, but just know, I'm in the School Lunch Tray. Yesterday. We sent out that the Civil Rights presentation for school year 2020 has been updated and posted on our website. So if you go on a program guidance to Save for Civil Rights, and you'll see the new PowerPoint up there. So this information is also contained in there. So don't worry if you miss anything. So civil rights. What are some examples of, let's start again.

### 2:49:54

So what are some examples of apparent filing a civil rights complaint that relate to the determining official? So when we think about this, anytime we are giving benefits to it, a student, that parent, say, we give them reduced, and I think they should be free, or we deny them benefits based on income. They may want to file a civil rights complaint to the determining official or for the process if they feel like they're being discriminated against.

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### 2:50:26

Okay, so, like I said, the parent disagrees with your determination.

### 2:50:31

Other things for our programs would be if, you know, you're denying a child who needs a special diet, Rick has a special diet request. You're denying them that that alternate meal, or if their being denied access to the programs altogether. So the district must have a written formal procedure for receiving and processing complaints alleging discrimination within the Child Nutrition Program. All processes should include, or must include, that these clients are forwarded to the Office of Civil Rights.

# 2:51:06

USDA has protected classes, CT Department of Education also has protected classes, so they include all federal plus, the other ones that are listed. So when we're talking about what is protected under Civil rights in Connecticut, it's all of these.

### 2:51:25

OK, so as a reminder, sponsors must comply with the USDA Regulation, nondiscrimination on the basis of handicap and programs or activities receiving federal assistance. So this really makes sure that you're ensuring that all children with disabilities have an opportunity to participate in and benefit from the National School Lunch and Breakfast Program. So if you have more questions about accommodating special diets because this could be a big subject, we do have a great guide that Susan Fiore put together that kind of talks about all the ins and outs of this, questions and answers. So you can also get to that through our website. but it's also available on the USDA web.

### 2:52:08

So as a reminder, you must make sure that you communicate with all applicants, parent participants, members of the public, and companions with disability as effective as communications with people without disabilities. So be thinking about this as you're putting out your letters, as you're sending out e-mails, what you post on your website.

### 2:52:28

Okay, provide auxiliary aids and services, such as alternative formats, tape text, audio recordings, braille materials, larger print sign language interpreters, if these things are being asked for, or if you know that there is a need in your district or in your community.

# 2:52:47

Okay, Limited English Proficiency, okay, this is all about making sure that you're, if you have a targeted group or a specific group of Limited, English proficient individuals in your district that you are kind of making sure that they have access to this material. It's your responsibility to determine that and to reach out to these people. So, reasonable steps that must be taken to ensure meaningful access to the program activities. So you can provide docents of a variety of languages. We offer a lot of our docents or letters that you'll see on online are in English and Spanish provide translation services if someone calls you and needs help or providing verbal

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information for those that may have trouble understanding or reading the written information that has been provided.

# 2:53:42

Right, so taglines you know what kind of skip over this. We know what taglines are. We know what the purpose is, to make sure that people know when they see something, they quickly know what it is, for example, just do it. Everyone knows if you see that that, that means that Nike.

### 2:53:59

Next slide.

### 2:54:06

Okay, so taglines are a phrase in a different language. We have on our website, a list of taglines that you could be using to add to your letters that are being sent out, and they are based on your top six languages that are spoken in Connecticut, but you would have most specific ones for you for your district. The list, there's six of them.

### 2:54:35

Okay, and these are all available from the EdSight, which is where the State Department of Education publishes all of their data that they collect from the school. So you can refer to the two handouts that we have for more information regarding taglines.

# 2:55:00

EdSight like I mentioned before is a great website to check out for the, your statistics specific for your district, even if you just Google EdSight or Connecticut. You can pull it up, you enter your district, you can click on this, those following links will get you to where you have specific, district level data to show you how many kids, you know. Maybe this language, how many, so you know what, where you're going to focus your materials, in your outreach.

### 2:55:31

If your district profile would look something like this, it's not the past year, but it would be the most current one up, there is school year 2018-2019.

# 2:55:44

Alright, so you can get help in your language, for, I'm putting this with your letter. These are all the different languages. It's saying the same thing, right. So, you wouldn't want to make sure that, if you're adding this to your letters, that, you do have a number or specific information that people can actually reach you at.

# 2:56:01

So if you don't have any way to offer this type of service, I would advise you not to include this resource that we provide with your letters.

# 2:56:14

Local agencies that fail to provide service to people with English Proficiency may be discriminating on the basis of national origin. Just remember, take reasonable steps to try to provide access to as many people within your district, in your community as possible and, and

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look at that and just really try to provide appropriate translations, income eligibility application, and parent letters.

2:56:43

Okay, so there's a lot of resources out there around Limited English proficiency to help guide you through this.

2:56:53

Alright civil rights complaint procedures are outlined in the Civil Rights FNS instruction 113-1, that's available through our website on the Civil Rights page.

2:57:06

Okay, that's it.

2:57:08

Again, the full presentation is available on our Civil Rights webpage.

2:57:15

Thank you so much Susan. So we are getting ah short on time, and I, do you, team do you want to put your camera's back on for this final segment?

2:57:28

So we can see can who's been talking, alright, so we, I'm gonna go through this pretty quickly and in a few of these ones together. So, uh so when you have a mismatch on the Direct Certification list, whether it's through an address or through a name, what do you do?

2:57:51

If there's a mismatch, I'm not sure what you mean by mismatch? Okay, so if there is a misspelling or the Direct Cert list says ST instead of street, but in your enrollment form for the, at your check, the student is enrolled in your district as using the whole word street, how do you rectify that?

2:58:12

So if the, if there's a misspelling or whatever, and you've identified that student, let's say, in case management and there's basically, there may be differences between the information that DSS has and the State Department of Education.

2:58:31

You can certainly contact your PSIS, the person who oversees that, or your district to see if there needs to be any changes, but as far as what goes on with DSS, there's really not much you can do about it, because of the fact that there's really nobody to contact about that information. The main thing is, is that you're able to provide a match, and that you have that information on file, and that child is receiving the correct benefit.

2:58:55

Thank you.

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### 2:58:57

So here's the chance Before we go on, I know that we are running short on time, and I do want to give a shout out to Michelle Rosada, who's our producer of go to. And she has been so instrumental in getting us up and being able to do a webinar. She has indicated that we are able to go a little bit longer, so I know I'm certainly willing to stay on and answer any questions that you have if you're able to do that, and remember, if we didn't get to a question, or if you have to leave, you can certainly look at for this webinar when it is posted on our website, and the questions will be addressed.

# 2:59:39

Thanks Teri, and so the family who is, who is going to pay in full or pay cash for their school meal, do they need to fill out these applications?

### 2:59:53

Okay, to answer that question, because the district can't require a parent or guardian to fill out a free and reduced meal application unless they want to do so, and they can't, they should not be collecting the applications or any information other than the purpose of providing that child with free and reduced price meals.

### 3:00:16

And so, if they, if they do collect this application, there is no income listed, is it okay for the, for the district, for the determining official to contact that parent and, and ask if that's correct?

### 3:00:30

I've covered that information, and if it is blank, then it is, the instructions are that is zero, and so you can select that application verification for cause, which will be separate from your normal verification process. So, no, new, the application is complete and you need to move forward with certifying that application. You cannot contact the family, but you can extend benefits and then you would verify that application cause thank you and I know we'll be diving in deep on that next week during the verification training, so thank you so much for that.

### 3:01:08

I was looking for another opportunity to plug our training next week as well.

# 3:01:12

So if the child is full pay during the beginning of the year and later determined through Direct Certification to qualify for free or reduced priced meals.

### 3:01:24

What date do we use in terms of making sure that the child is, is being indicated for the benefit level correctly. So do we use that date from the beginning from that first application, or do we use that direct certification date for how were claiming them?

### 3:01:45

It's based on when you get the information that they are eligible for benefits. So, similar to a family applying for benefits in November. It's when you process that application soccer directly certified. If they show up on the list, here, be checking out, lists weekly. It's the date that you,

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they appeared and you're able to extend benefits that you would start benefit. So, proactive. I believe you can answer this one as well for, so, if a student shows up on the direct certification list, but they already have an income application, can we just get rid of that application, or do we need to keep that?

## 3:02:30

You'll need to keep kind of application, because that application is documentation, if you extended benefits for free or reduced price, meals based on income. That documentation covers, that period. So if they then show up on the Direct Certification List. Then certainly, if eligibility has changed, and that you're changing their status to directly certified. Now, free benefits, you would have that Direct Certification documentation to support them on the eligibility. So with that master list, an area that I covered with the master list, you need to have the supporting documentation, if it says income for each change. So those changes occur to that Master list. So, made the documentation to support those changes, So you cannot get rid of that application.

### 3:03:18

That's very helpful, thank you Fionnuala. I'm gonna throw this one to Susan with the civil rights complaint, typically listed as the contact person.

## 3:03:28

So, I've seen it different at different schools because it's around the Child Nutrition Programs. A lot of times districts get confused and think that it's their civil rights process for the entire district, which would encompass all kinds of complaints about access or other things, but our process is really just around the Child Nutrition Programs. So, sometimes, it makes perfect sense that it would be the Food service Director, would be the person that would filter all of those complaints, or receive those complaints, and for them, often, USDA, In some cases, we have seen in smaller districts, it might be your business official, it could even be your, you know, the principal of the school.

### 3:04:11

So whoever it is, it just needs to be someone who understands our program, understands the process for filing if parents, or if somebody wants to file a complaint, and what to do with it. And on our website, we have the exact template that needs to be used for your procedure, for your district. We look at that on an Administrative Review, and everyone should be using our template without any changes, and then that person, though, would be up to that.

#### 3:04:43

And I'm going to take this next one. So, if we have a distant learners that one of the models where we're serving remote learners, and if the child is not eligible for free or reduced price meals, are we going to charge? Do we need to charge that household for the full price? And this is a great opportunity to remind everybody that coming into this school year for 2020-2021, a hard time saying that for some reason. We are under regular school breakfast, school lunch rules, in terms of claiming. So, we only have five flexibilities right now that we've been authorized to use from the United States Department of Agriculture.

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### 3:05:24

One is to allow you to do non congregate, one is to waive the meal service time requirements, one, is to allow parents or guardians to pick up, one is for you to waive the offer, versus serve requirement in high schools, and we also have the meal pattern application, Encourage you to, to join our town halls to learn more.

### 3:05:44

But you will be, you will need to charge any student who is, who is on a reduced, or a paid plan, the appropriate amount, to receive those meals, for claiming purposes, regardless of whether they're remote, eating in school, any of that.

### 3:06:06

So, if a child is directly certified as OT, and then comes up as FM, do you change and then allow all children in the household to have to receive benefits?

### 3:06:20

Answer is yes. If there's two children on the direct certification list, and one has a higher benefit, such as FM, then you would extend that benefit to all children in the household. The only time that doesn't happen is with OT.

# 3:06:36

And so the only, the last question that has come in is, what do you do if a parent has identified on their application that the child as fast as a foster child, but that child is not under Direct Certification List or in the district provided list?

### 3:06:57

Remember that if they, if they check off a foster child on the list or on their application, you don't have to validate that, they're a foster child.

### 3:07:07

So you would process the application, as long as the rest of the application is complete.

#### 3:07:15

Just remember that then they're not directly certified, they're subject to verification because it's self-declared foster on the application. Foster is one of those tricky ones.

# 3:07:27

Thank you so much. So those are all the questions that were submitted to us, and I think that was a great way to end it Fionnuala. See if anyone has another plug for the verification workshop that will be doing next week, where, you know, any of these, any of the outstanding questions you may have or tricky situations, We are going to be covering those and hopefully be able to answer some questions. And it's great that you're answering these questions. What it does is it allows us to be able to develop the resources and the documentation, the documents that you need, the guidance you need. And if we don't hear what your questions are, it's hard for us to know where you might need some extra support. So definitely join that one. Let us know what your questions are, and we can certainly do our best to cover them, then. But we will take that into account for

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future resource development as well. So, with that, I just want to thank my team. I'm going to put myself on mute and case anyone has some last words.

### 3:08:19

But that amazing team here. So if you have questions, certainly reach out to them. I know everybody has some unique situations out there that might, they might need a little support navigating that don't, know, we're here to support you, but thank everybody for all that you're doing, and for being so dedicated to your students in these programs.

### 3:08:39

I just want to say thank you, thank you, everybody, and I wish you the very best of luck with the challenging opening that's ahead of us and of schools, and I look forward to seeing you next week at the verification workshop if you have signed up. So, take care.

# 3:08:57

All right, bye.

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For more information, visit the Connecticut State Department of Education's Training for School Nutrition Programs webpage, or contact the school nutrition programs staff in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/Training/Building\_Success\_Processing\_Applications\_Transcript.pdf.

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